

**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/>;

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<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

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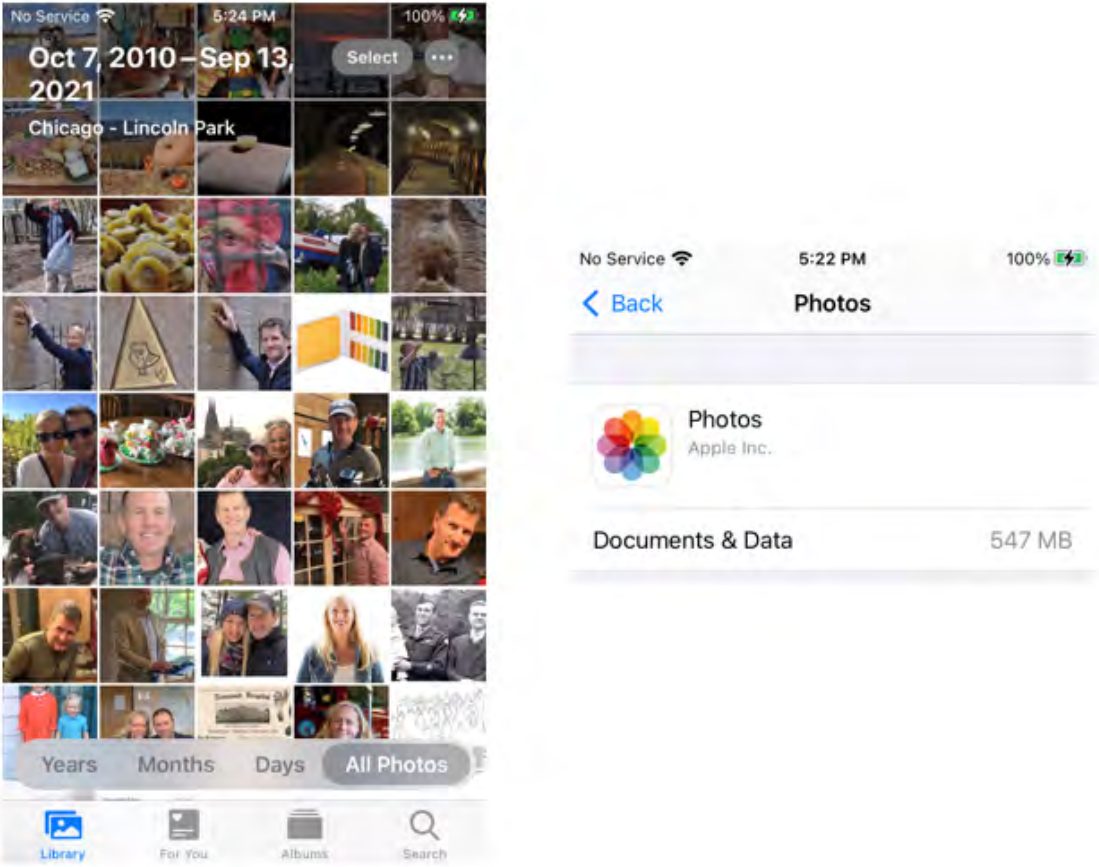


# **Exhibit A.1**

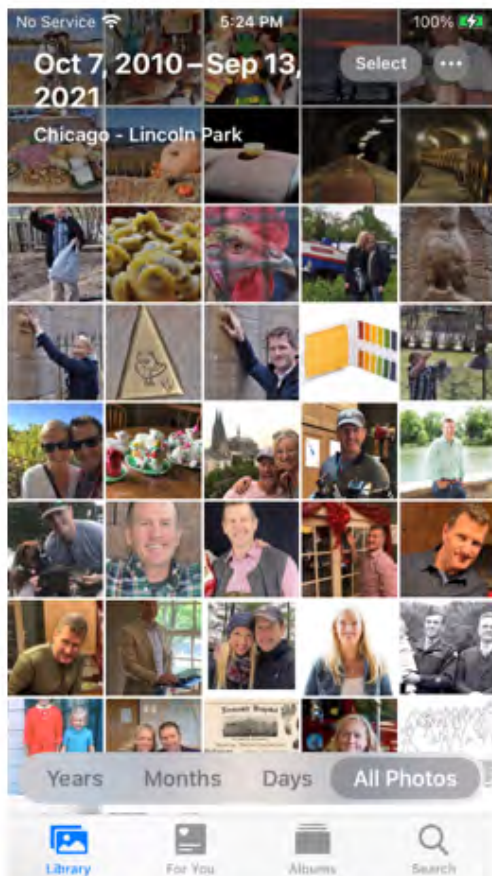
**U.S. Patent No. 9,552,376 – Infringement Claim Chart**

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.

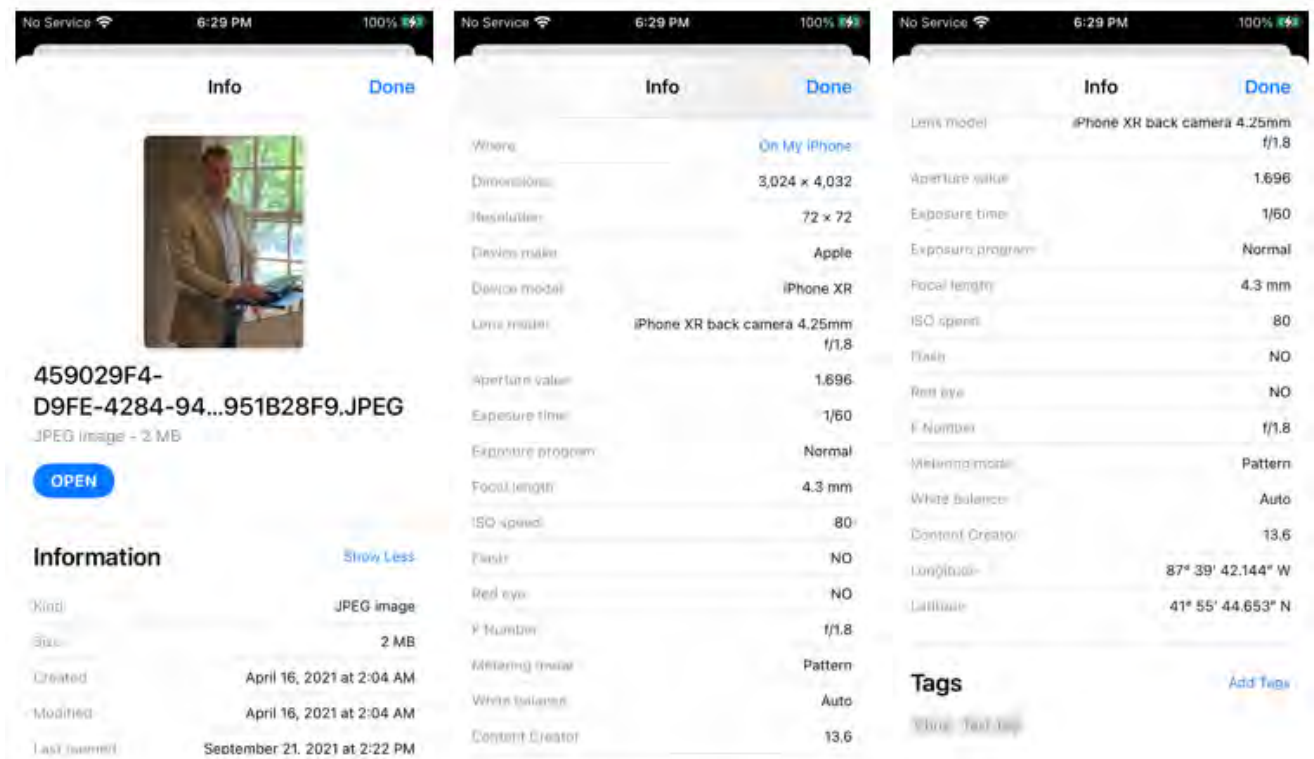
	
<p><b>1[a][i]</b> each of the digital files having embedded therein content data and metadata including tags, the content data including a digital photograph</p>	<p>Each of the digital files have, embedded therein, content data and metadata including tags. The content data includes a digital photograph 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;

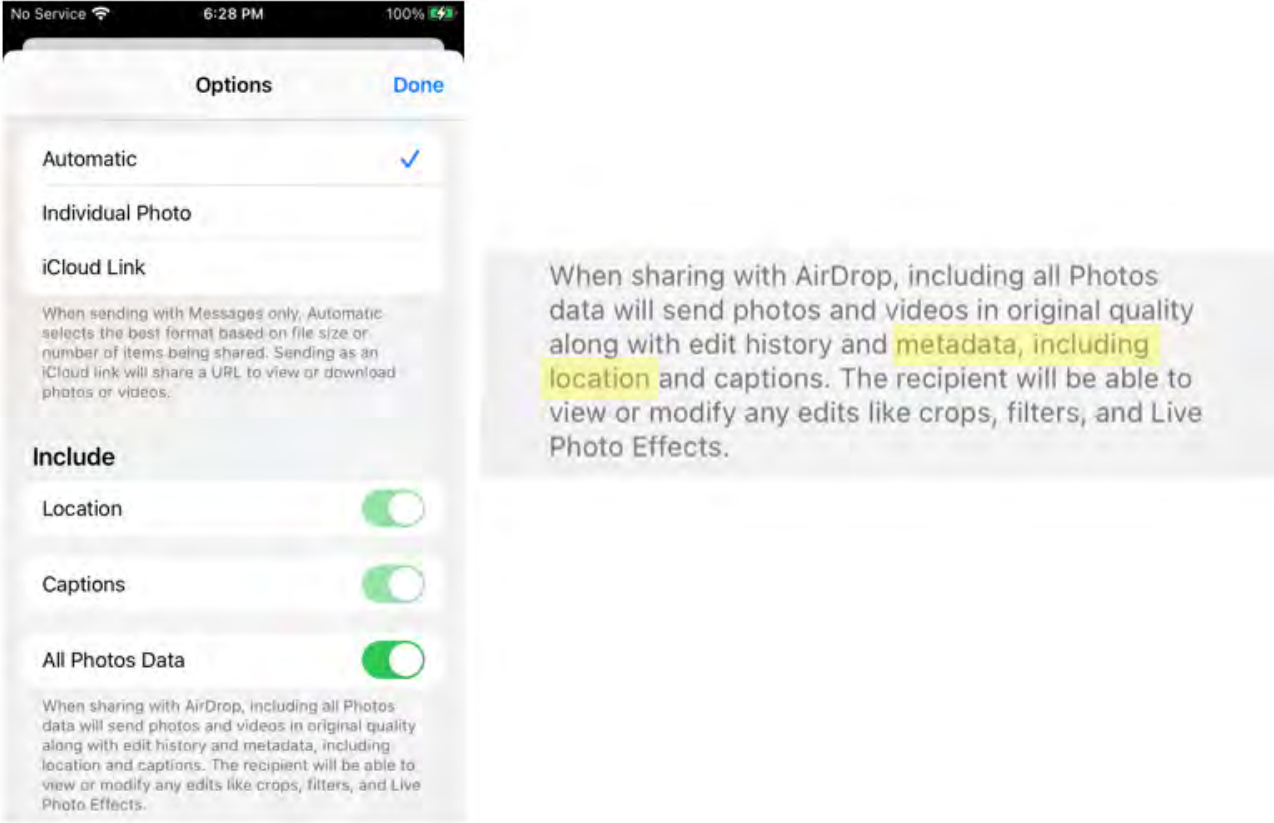


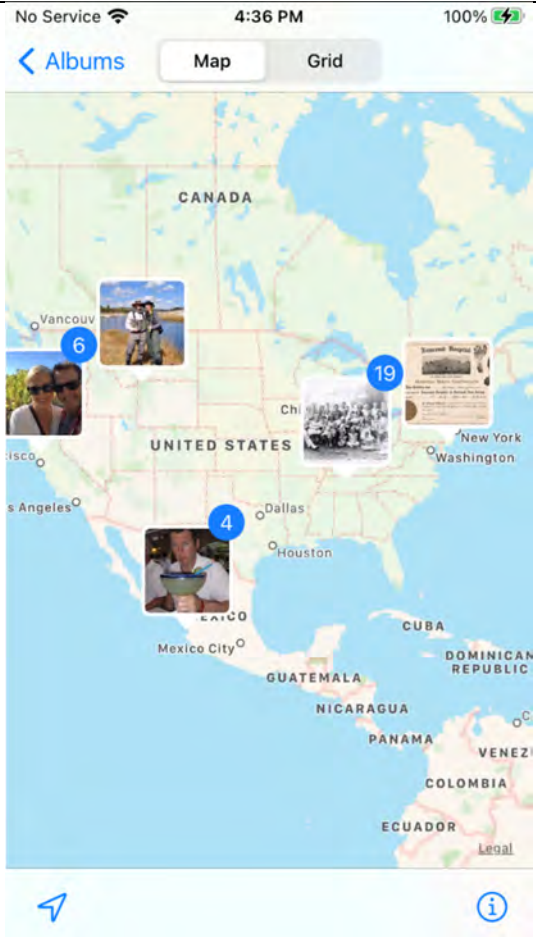
The metadata includes a geotag indicative of geographic coordinates where the digital photograph or image or video was taken. For example, as shown below, exemplary metadata for one of the digital files is visible in iOS via the Files application. This metadata includes a geotag indicative of geographic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

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

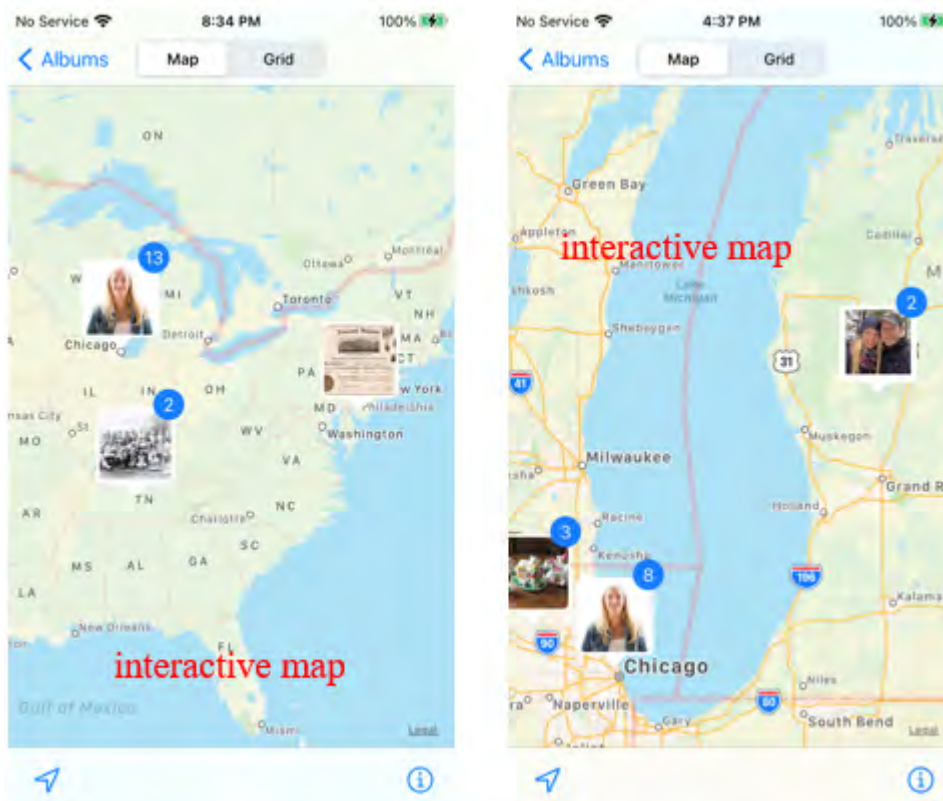


Additionally, the iOS Photos application can export metadata (which includes location information) that is embedded in a given digital file.

	
<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, the word 'Albums', and two buttons labeled 'Map' and 'Grid'. The main area of the screen is a map of North America, including parts of Canada, the United States, and Mexico. 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 San Francisco, Los Angeles, Houston, and Mexico City. At the bottom of the screen, there is a compass icon on the left and an information icon (an 'i' in a circle) 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;



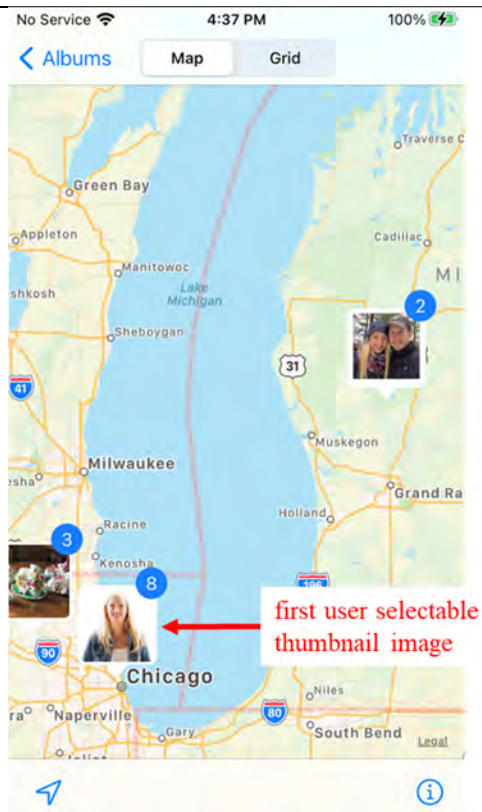
**1[b][ii]** (ii) a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic coordinates of a first geotag, a first

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.



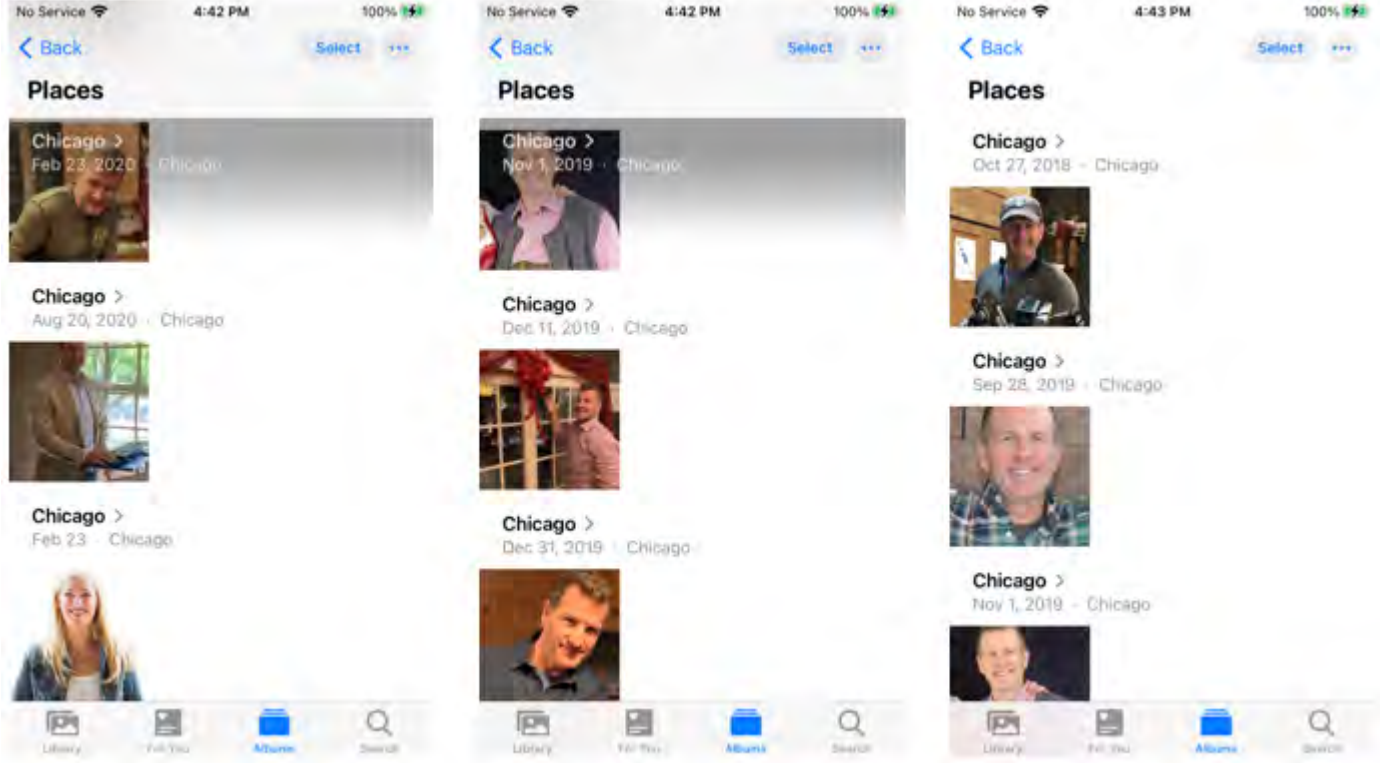
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple iOS


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



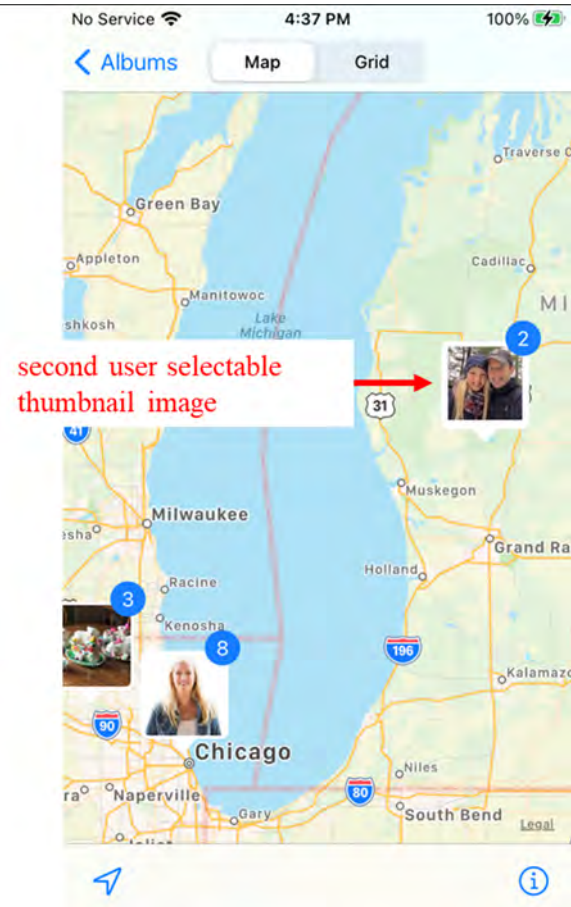
iOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].

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

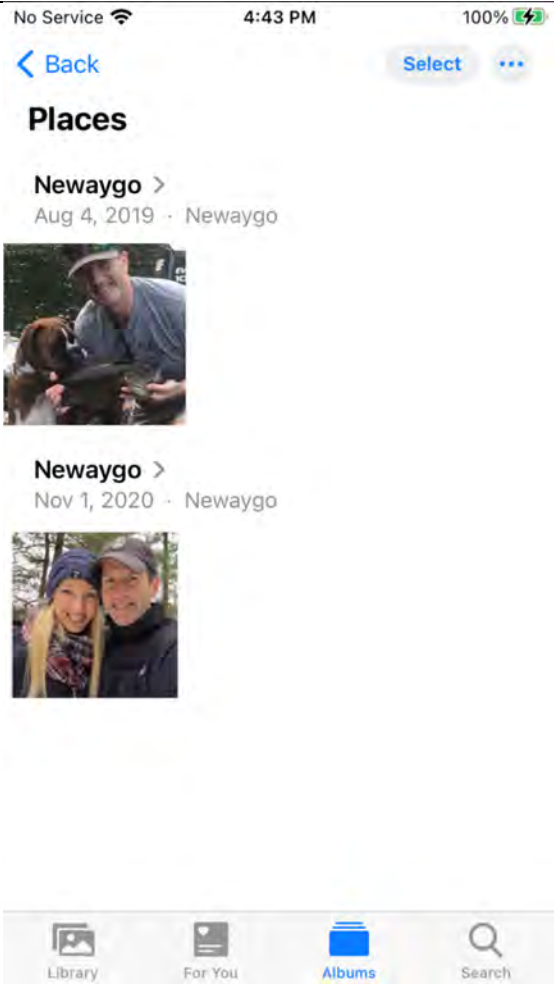
	 <p>The image shows three side-by-side screenshots of the iOS 'Places' album view. Each screenshot displays a grid of photo thumbnails. The first thumbnail in each grid has a semi-transparent white box overlaid on its top-left corner, containing the text 'Chicago &gt;' and a date. The date varies across the screenshots: 'Feb 23, 2020' (left), 'Nov 1, 2019' (middle), and 'Oct 27, 2018' (right). The rest of the thumbnails in the grid are partially obscured by this overlay. The bottom of each screenshot shows the standard iOS navigation bar with icons for Library, Favorites, Albums, and Search.</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>

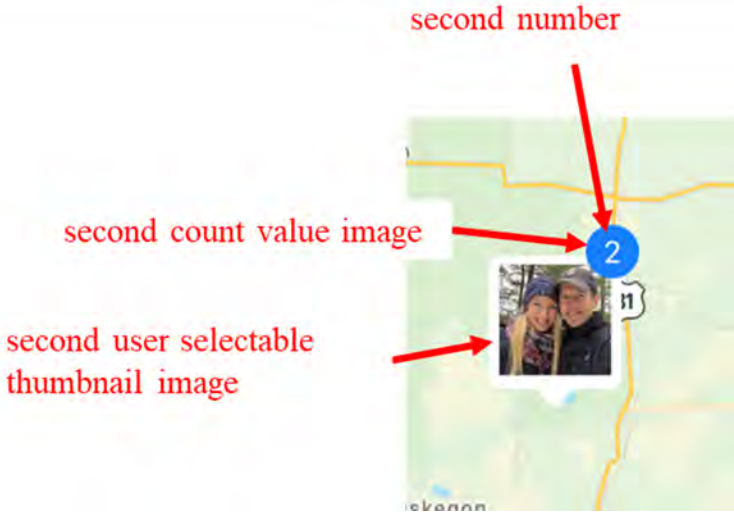
<p>number that corresponds to the number of digital photographs or images or videos in the first set of digital files;</p>	 <p>The image shows a map interface with a geotag '8' in a blue circle. A red arrow points to the number '8' with the label 'first number'. Another red arrow points to the blue circle containing '8' with the label 'first count value image'. A third red arrow points to a thumbnail image of a woman's face with the label 'first user selectable thumbnail image'. The map also shows 'Kenosha' and 'Chicag' (Chicago) and a highway shield for '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>

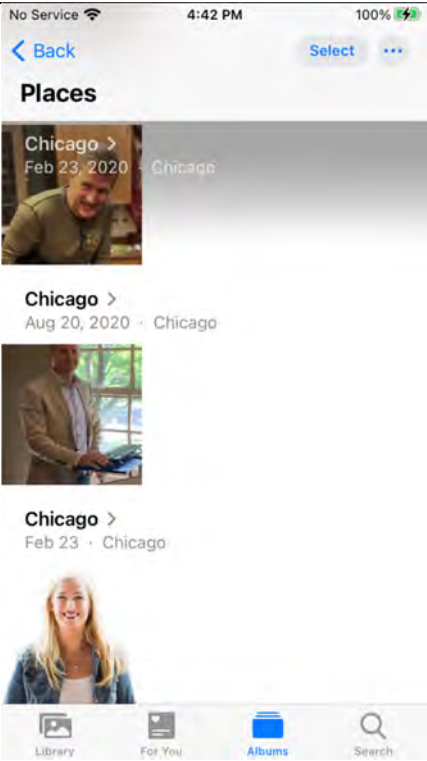
the second geotag;  
and

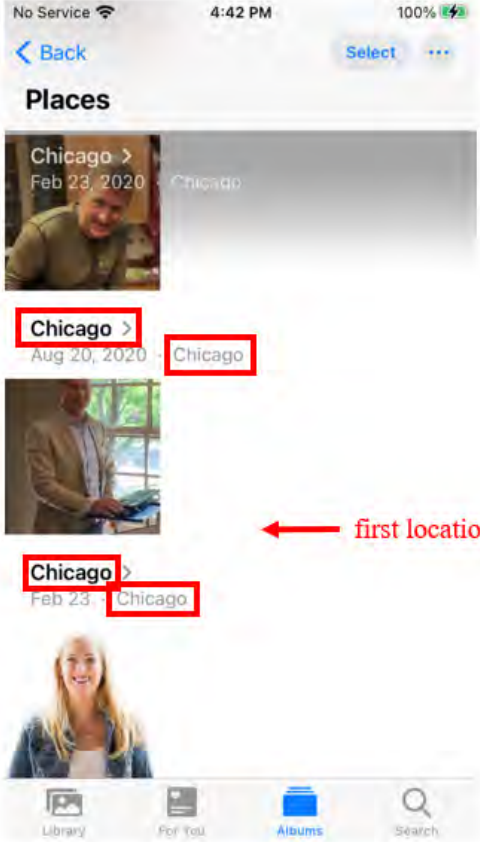


iOS stores a second set of digital files includes all of the digital files having the second geotag. *See also* information for limitation 1[a].

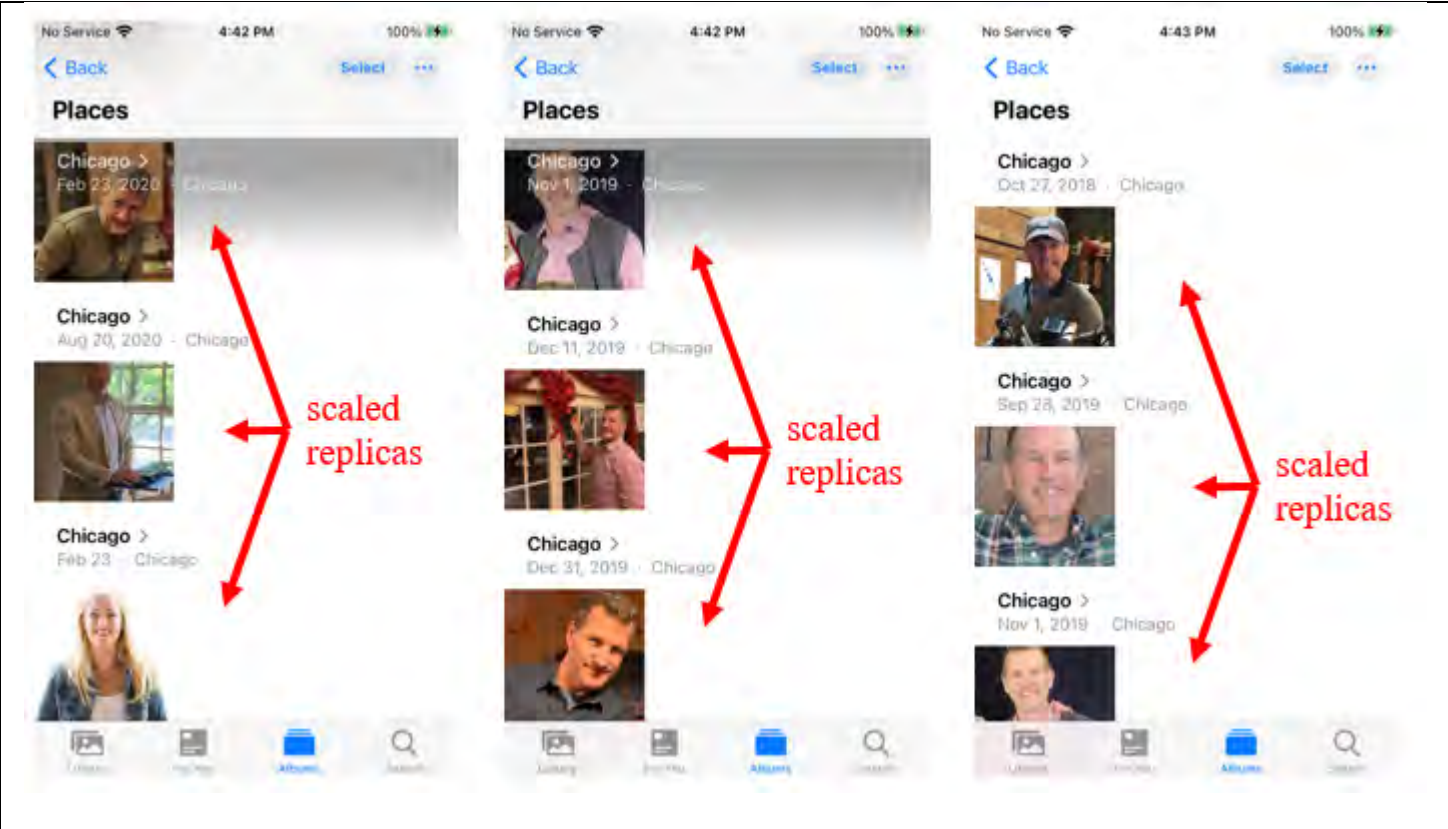
	 <p>The screenshot shows the Photos app interface on an iPhone. At the top, the status bar displays 'No Service', '4:43 PM', and '100%' battery. Below the status bar, there is a 'Back' button on the left and 'Select' and 'More' options on the right. The main content area is titled 'Places' and contains two photo entries. The first entry is from 'Newaygo' dated 'Aug 4, 2019' and shows a man with a dog. The second entry is also from 'Newaygo' dated 'Nov 1, 2020' and shows a man and a woman. At the bottom, the dock contains 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>

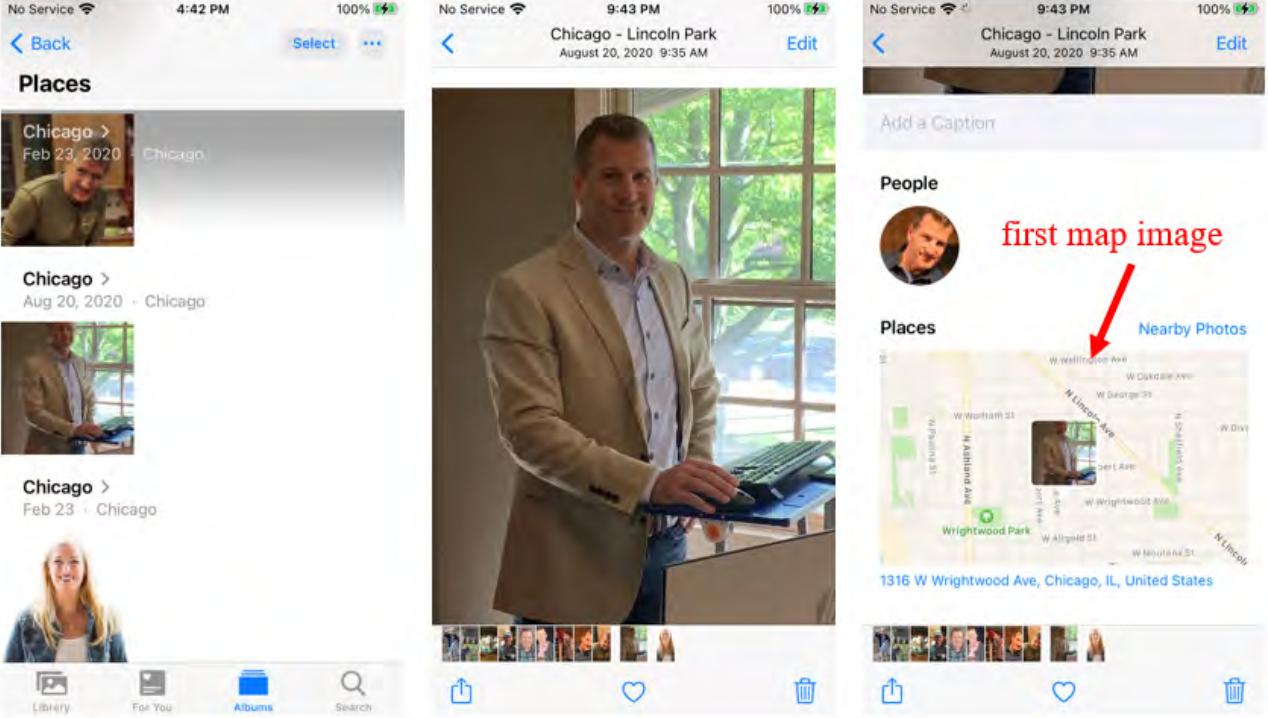
<p>including displaying</p>	 <p>The screenshot shows the 'Places' section of the Photos app. It displays three photo thumbnails, each with a geotag for 'Chicago'. The first photo is dated 'Feb 23, 2020' and shows a man's face. The second photo is dated 'Aug 20, 2020' and shows a man in a suit. The third photo is dated 'Feb 23' and shows a woman's face. 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 with location tags. The first photo has a tag 'Chicago &gt;' and 'Chicago'. The second photo has a tag 'Chicago &gt;' and 'Chicago'. The third photo has a tag 'Chicago &gt;' and 'Chicago'. A red arrow points to the 'Chicago &gt;' tag of the second photo, with the text 'first location name' next to it. Red boxes highlight the 'Chicago &gt;' and 'Chicago' text in each of the three photos.</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>



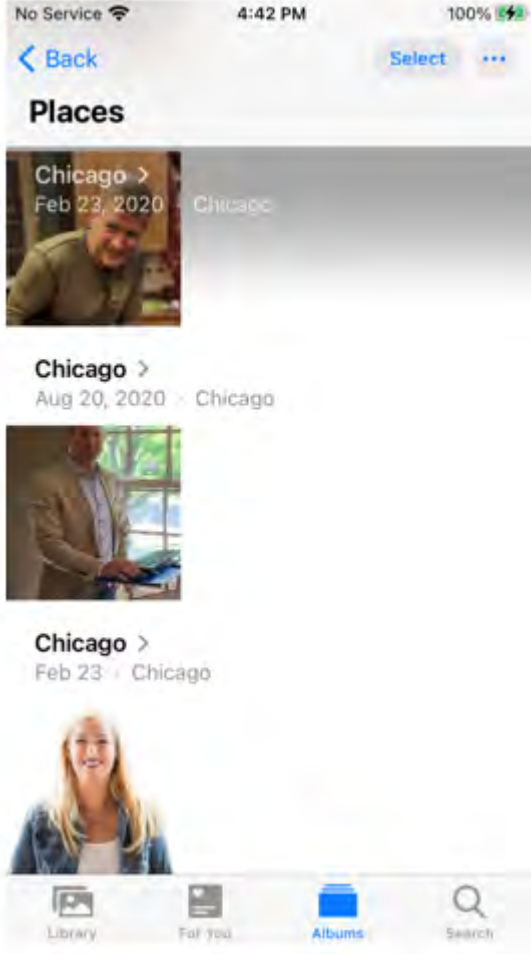
	 <p>The image displays three side-by-side screenshots of the iOS 'Places' app interface. Each screenshot shows a list of geotags for 'Chicago' with associated photos and dates. Red arrows point from the text 'scaled replicas' to the geotag entries in each screenshot. The first screenshot shows geotags from Feb 23, 2020, Aug 20, 2020, and Feb 23. The second screenshot shows geotags from Nov 1, 2019, Dec 11, 2019, and Dec 31, 2019. The third screenshot shows geotags from Oct 27, 2018, Sep 28, 2019, and Nov 1, 2019. The app interface includes a 'Back' button, a 'Select' button, and a bottom navigation bar with icons for Library, Favorites, Albums, and Search.</p>
<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

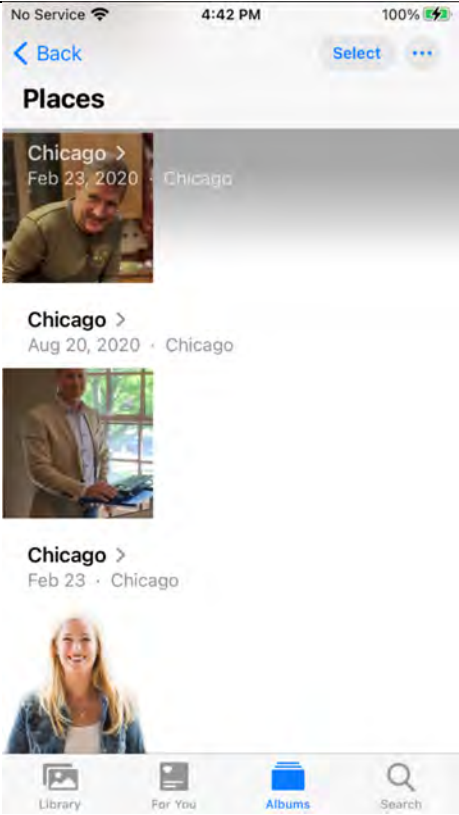
	 <p>The figure consists of three sequential screenshots from an iPhone Photos app. The first screenshot, taken at 4:42 PM, shows a gallery of photos for the location 'Chicago'. The second screenshot, taken at 9:43 PM, shows a full-size photo of a man in a tan blazer standing at a desk. The third screenshot, also at 9:43 PM, shows a map view for 'Chicago - Lincoln Park' with a red arrow pointing to a small thumbnail of the man's photo. The map shows the address '1316 W Wrightwood Ave, Chicago, IL, United States' and nearby streets like W Wellington Ave and W Oakdale Ave.</p>
<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

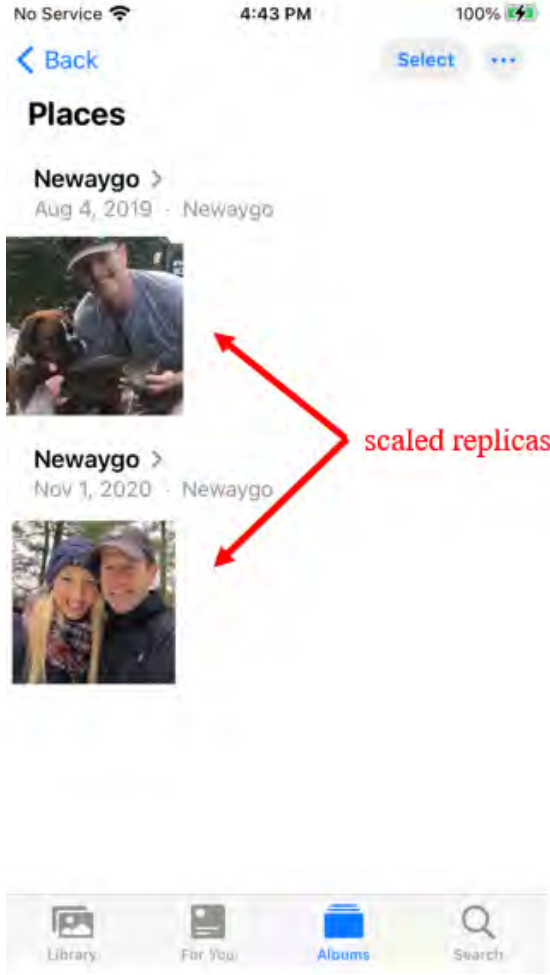
	<p>The image displays four sequential screenshots from an iPhone Photos app. The first three screenshots show a 'Places' album for 'Chicago' with a list of photos. Red arrows labeled 'scaled replicas' point to the top photo in each of these three screenshots. The fourth screenshot shows a map view for 'Chicago - Lincoln Park' with a red arrow labeled 'first map image' pointing to a photo overlaid 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 locations, both named 'Newwaygo'. The first location is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second location is dated 'Nov 1, 2020' and features a photo of a man and a woman. A red box highlights the 'Newwaygo' text in the second location's header, and a red arrow points to it from 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>

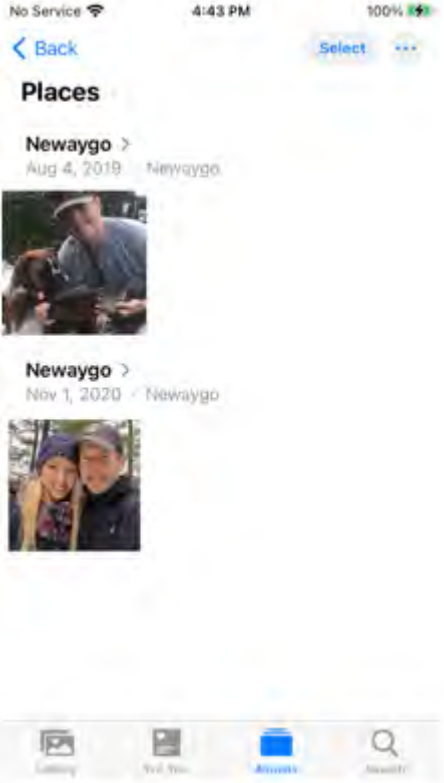
	 <p>The screenshot shows the 'Places' section of an iPhone Photos app. At the top, it says 'No Service', '4:43 PM', and '100%' battery. Below the 'Places' title, there are two entries for 'Newwaygo'. The first entry is dated 'Aug 4, 2019' and shows a photo of a man with a dog. The second entry is dated 'Nov 1, 2020' and shows a photo of a man and a woman. Two red arrows originate from the text 'scaled replicas' on the right and point to the two photos. At the bottom of the screen, the navigation bar shows icons for 'Library', 'For You', 'Albums', and 'Search'.</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>

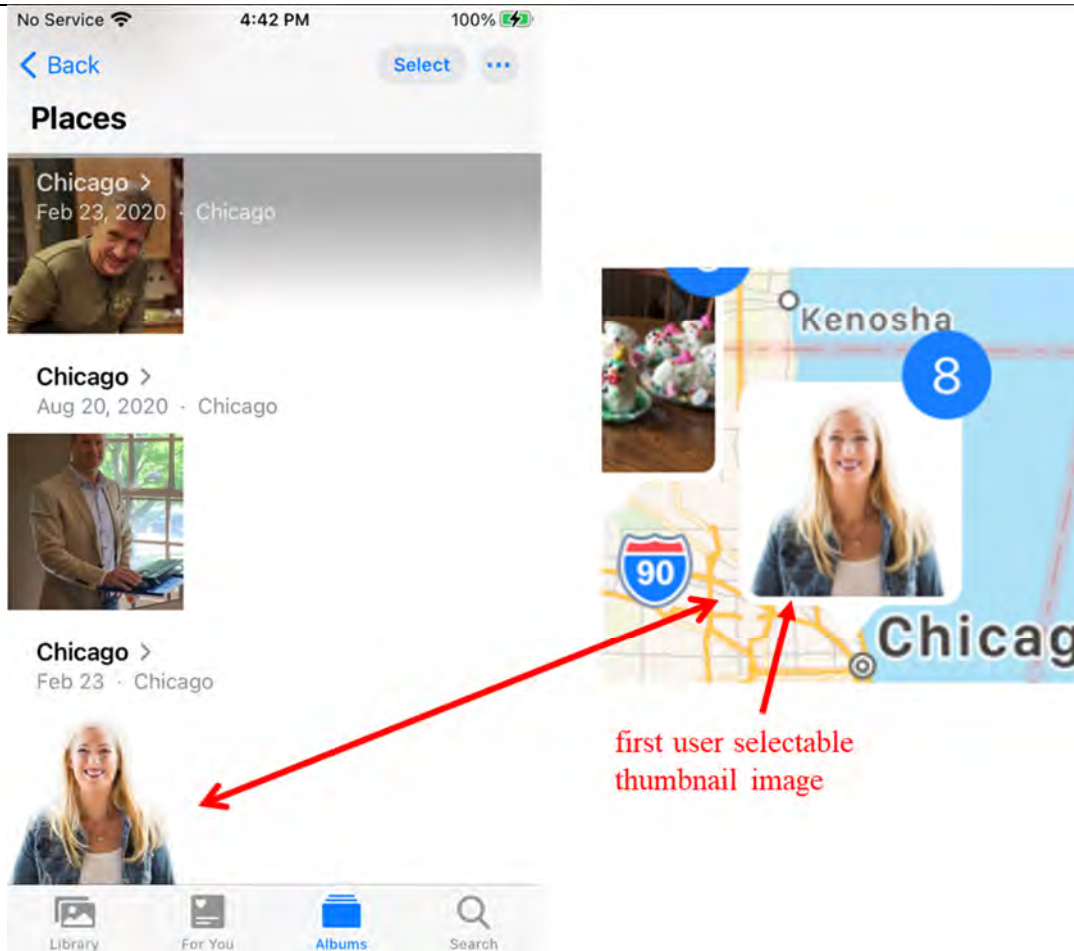


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	<p>The image contains two screenshots from an iPhone Photos app. The left screenshot, taken at 4:43 PM, shows a gallery view with two photo albums titled 'Newaygo'. The first album is dated 'Aug 4, 2019' and the second is dated 'Nov 1, 2020'. The right screenshot, taken at 9:43 PM, shows a photo of a man and a dog. A red arrow points to a map overlay on the photo, which is labeled 'second map image' in red text. The map overlay shows a location in Newaygo, MI, United States, with a photo thumbnail and a 'Nearby Photos' link. The bottom of the right screenshot shows the standard iOS Photos app navigation bar with icons for Library, My Video, Albums, Search, Share, Favorites, and Delete.</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</i> information for claim 1.</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>

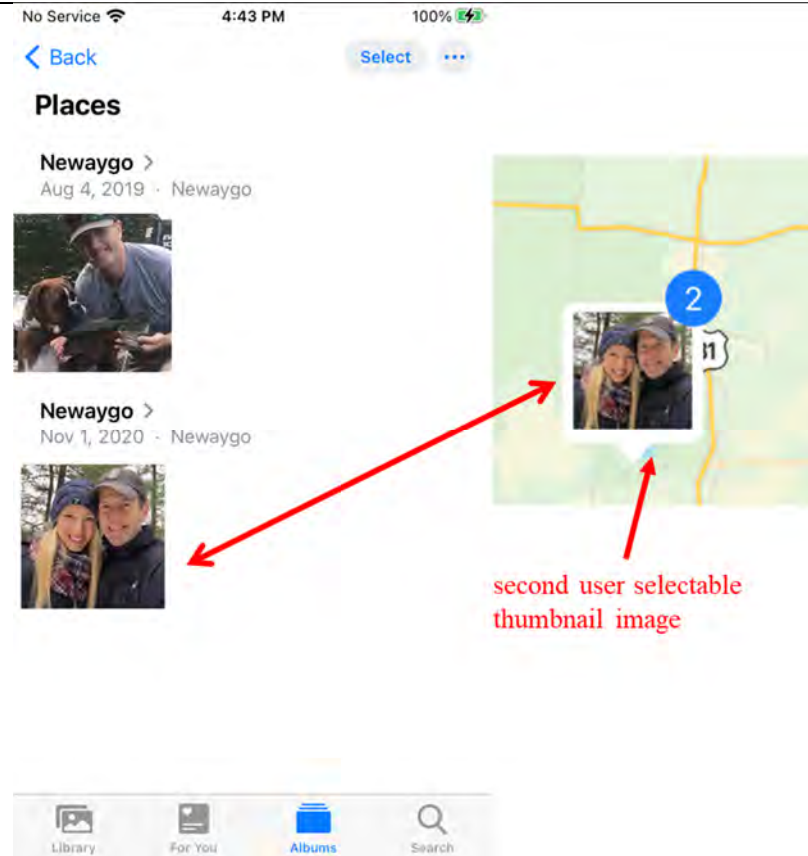
representation of at least one of the digital images in the first set of digital files, and



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.



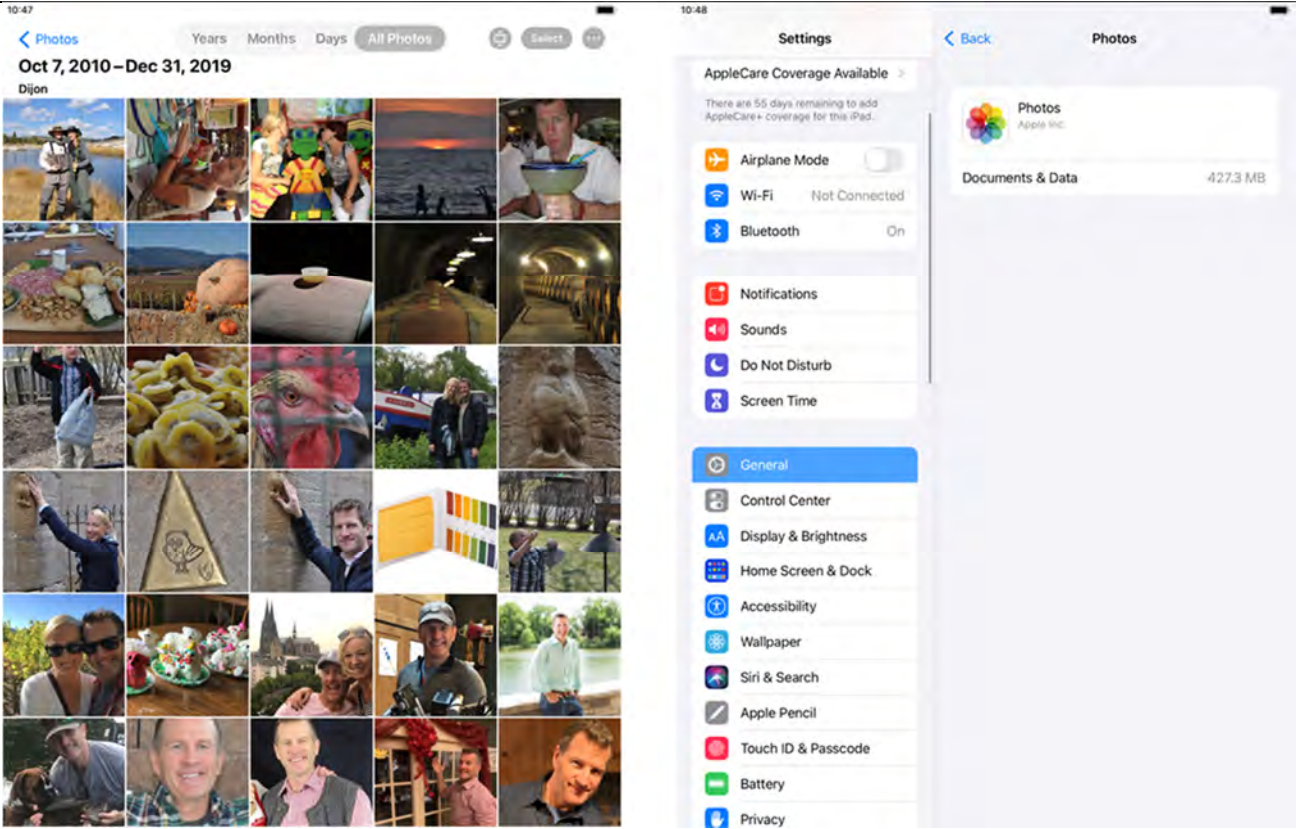
# **Exhibit A.2**

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

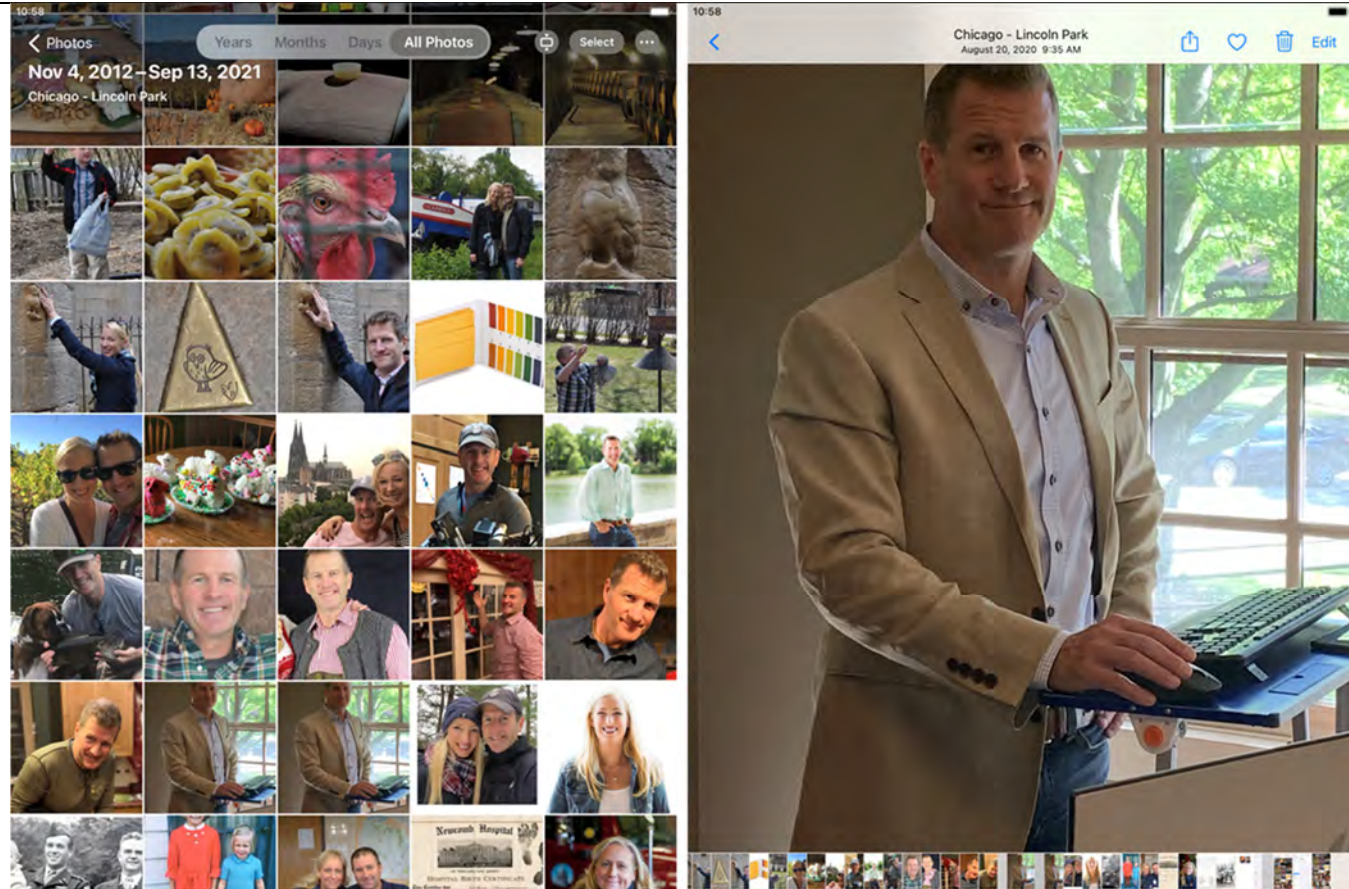
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 9,552,376 (“the ‘376 patent”) in Apple iPadOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) 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.

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	 <p>The image displays two screenshots from an iPadOS interface. The left screenshot shows the 'Photos' app gallery for the period 'Oct 7, 2010 - Dec 31, 2019' in the 'Dijon' album. It features a grid of 40 small thumbnail images, including people, landscapes, and objects. The right screenshot shows the 'Settings' app with the 'Photos' section selected, displaying options like 'Airplane Mode', 'Wi-Fi', 'Bluetooth', 'Notifications', 'Sounds', 'Do Not Disturb', and 'Screen Time'.</p>
<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 or image or video, the metadata</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>

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.



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The image displays two screenshots of the iPadOS Photos application interface. The left screenshot shows the 'Metadata' view for a JPEG image. The image is titled '459029F4-D9FE-4284-94...6951B28F9.JPG' and is 2 MB in size. Below the image is an 'Information' section with the following details:

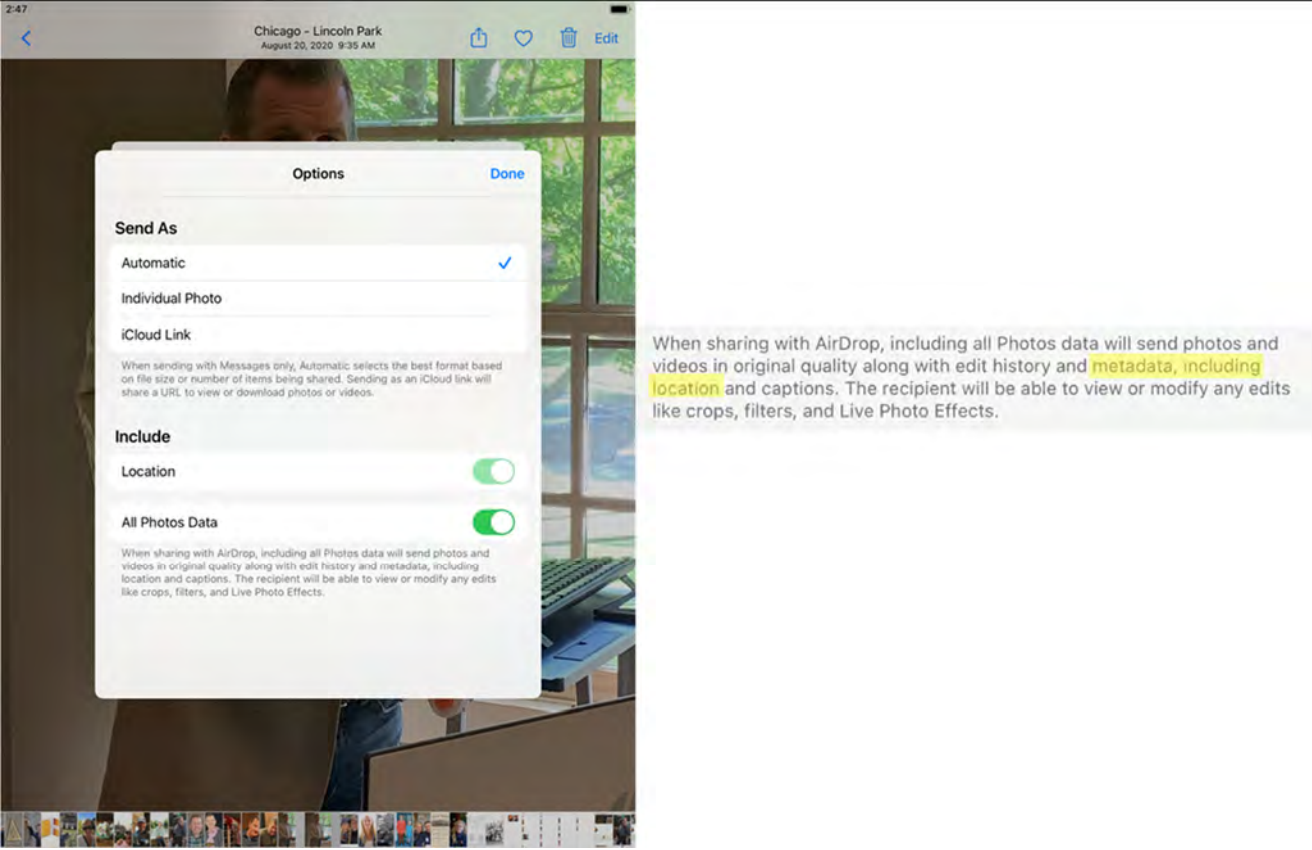
Kind	JPEG image
Size	2 MB
Created	April 16, 2021 at 2:04 AM
Modified	April 16, 2021 at 2:04 AM
Last opened	September 22, 2021 at 11:05 AM
Where	<a href="#">On My iPad - Metadata</a>
Dimensions	3,024 x 4,032
Resolution	72 x 72
Device make	Apple
Device model	iPhone XR
Lens model	iPhone XR back camera 4.25mm f/1.8
Aperture value	1.696

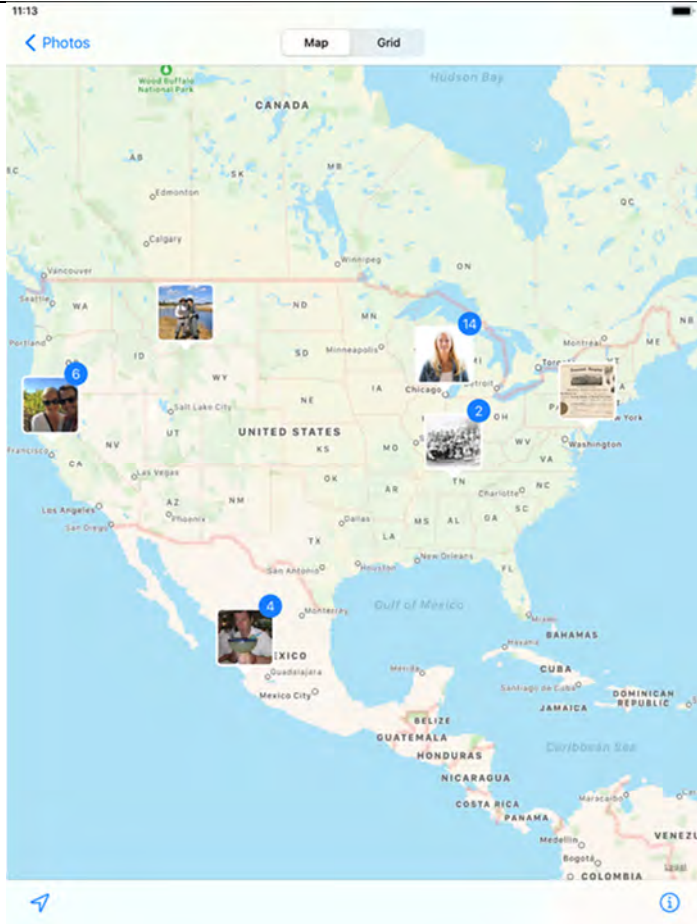
The right screenshot shows the 'Information' view for the same image, providing a more detailed list of technical specifications:

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	<a href="#">On My iPad - Metadata</a>
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
Latitude	41° 55' 44.653" N

Below the information section, there is a 'Tags' section with an 'Add Tags' button.

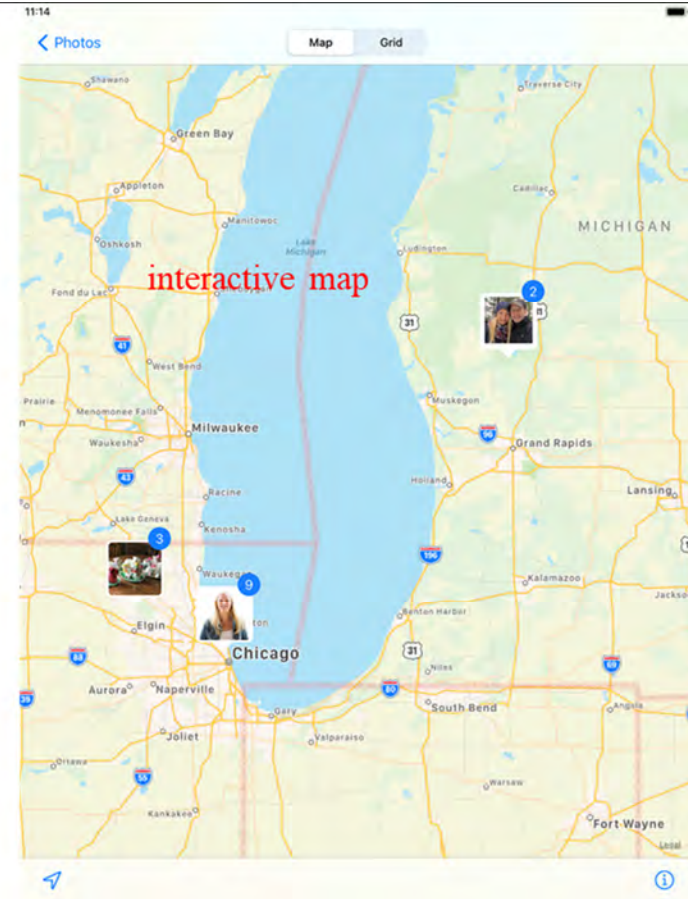
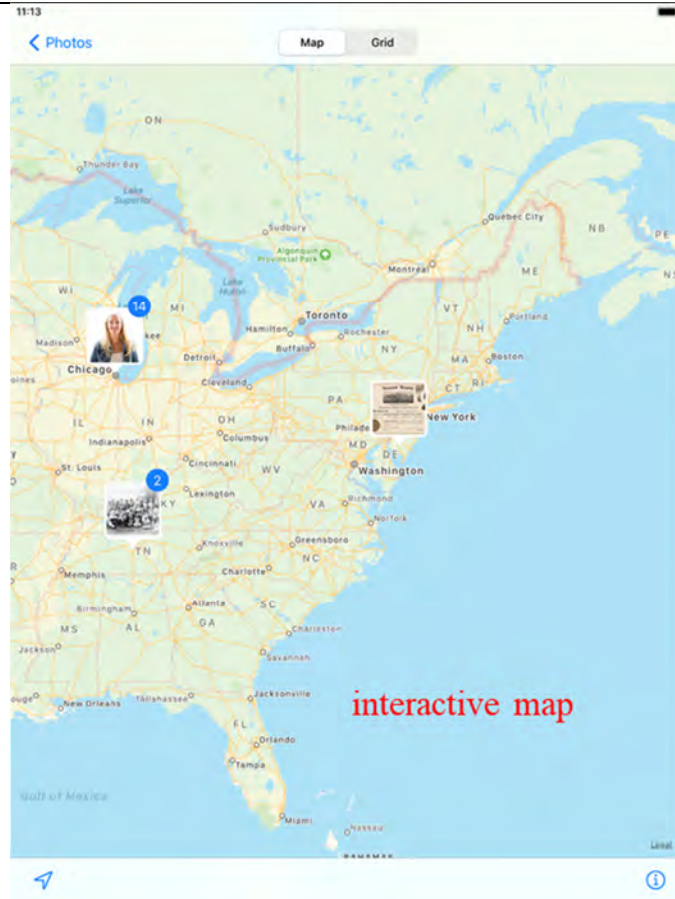
Additionally, the iPadOS Photos application can export metadata (which includes location information) that is embedded in a given digital file.

	
<p><b>1[b]</b> displaying a map view on a video display device, the displaying the map view including displaying:</p>	<p>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 and the word "Photos". To the right of the navigation bar are two tabs: "Map" (which is selected) and "Grid". The main area of the screen 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. The numbers are 6, 14, 2, and 4. The map shows state and provincial boundaries, major cities, and geographical features like Hudson Bay and the Gulf of Mexico. At the bottom of the screen, there is a blue location pin 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>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>

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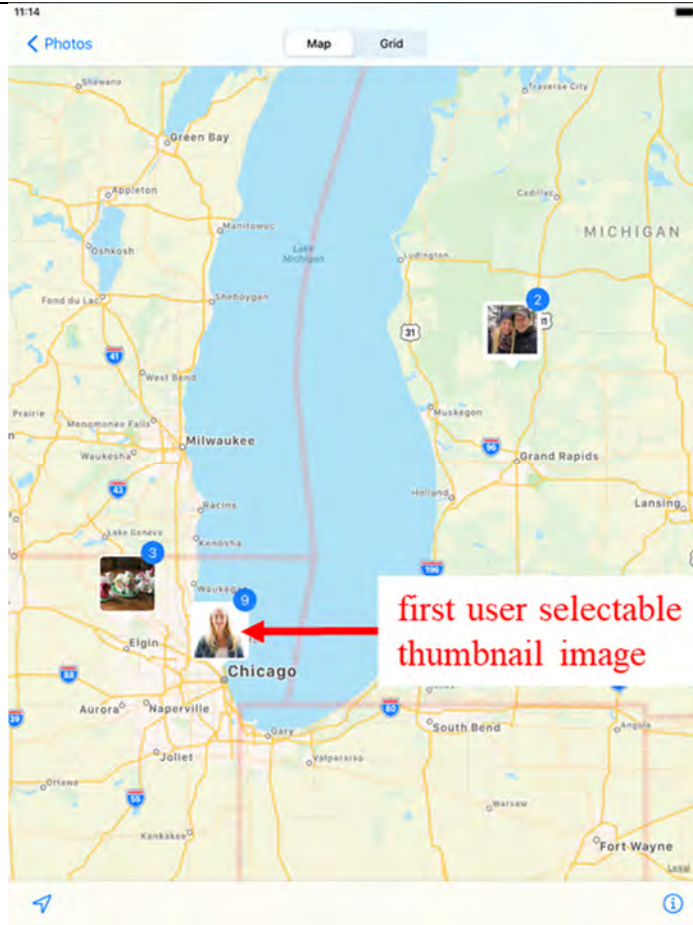
a first screenshot of the video display device;



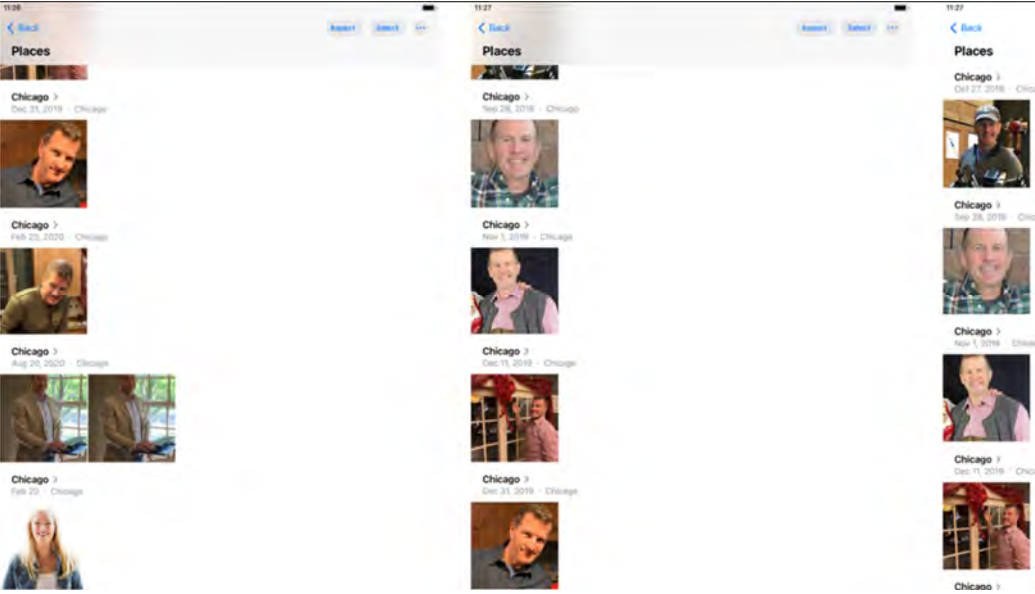
**1[b][ii]** (ii) a first user selectable thumbnail image at a first location on the interactive map corresponding to the geographic


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;

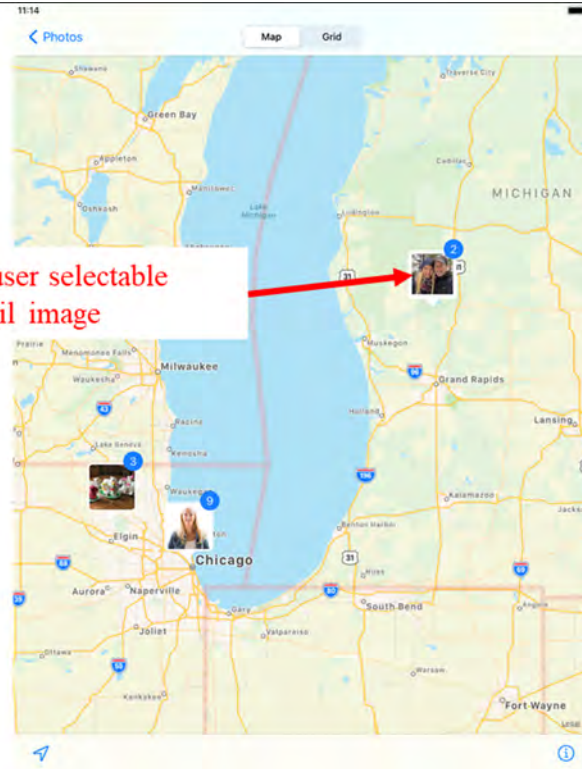


iPadOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].

	 <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>The image shows a map interface with a geotag. A red arrow labeled "first number" points to a blue circle containing the number "9". 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. The map background shows locations like Waukegan, Elgin, and Chicago.</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>

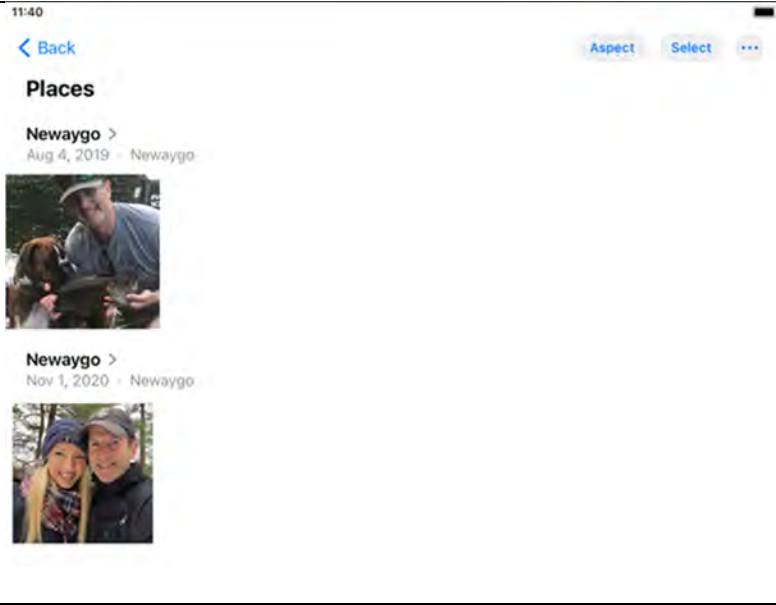
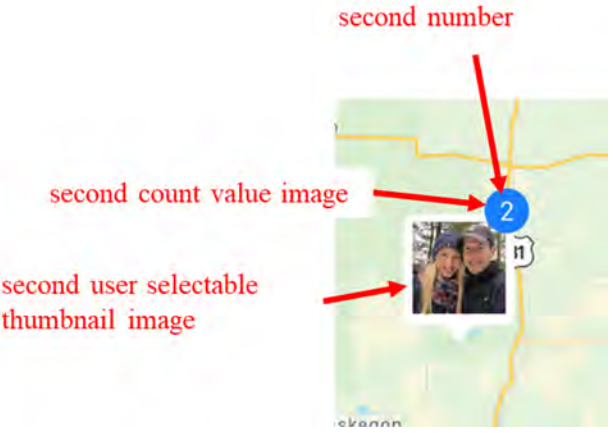
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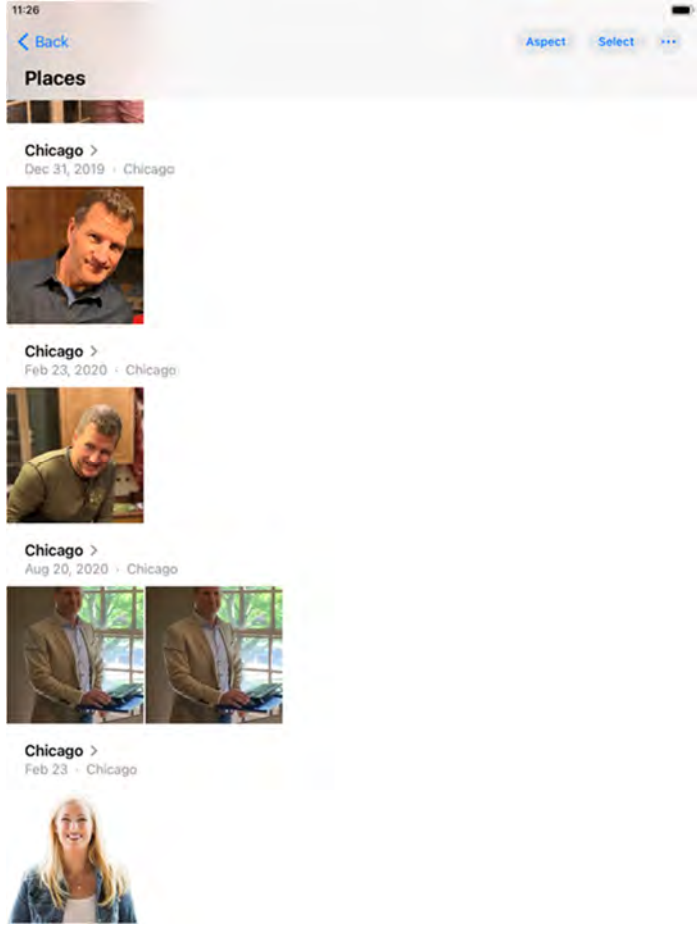


second user selectable  
thumbnail image

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 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 shows two photo thumbnails. The first thumbnail is from 'Newwaygo' and is dated 'Aug 4, 2019'. The second thumbnail is also from 'Newwaygo' and is dated 'Nov 1, 2020'.</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 interface 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>

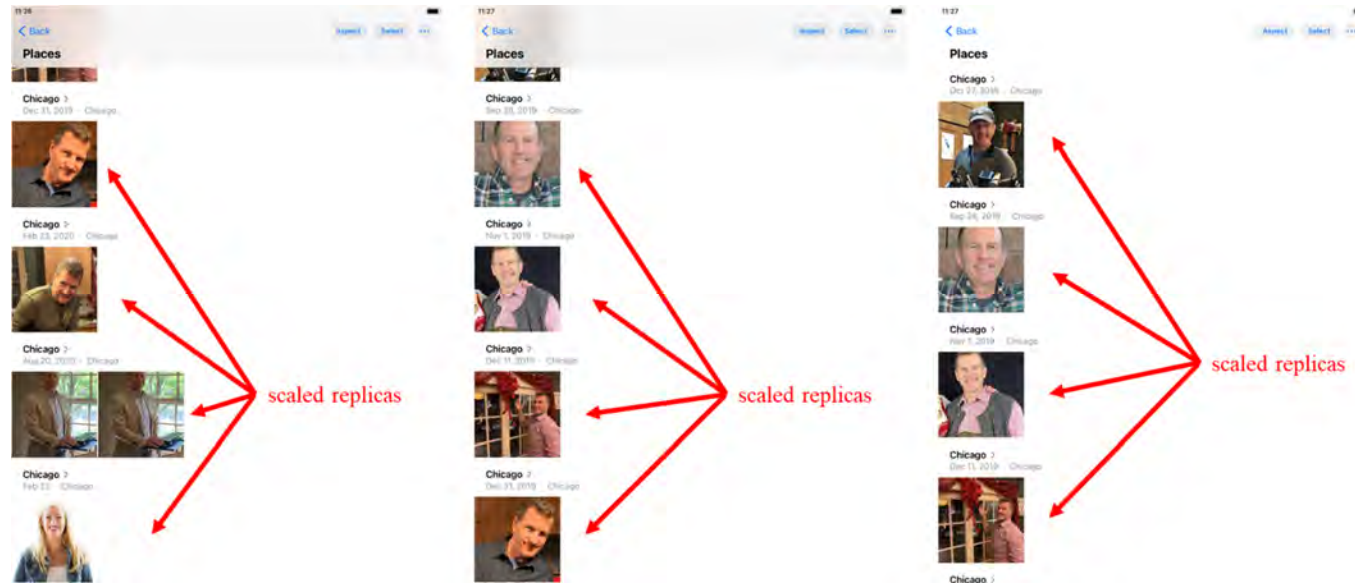
**1[c][i]** (i) a first location name corresponding to the first geotag,

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

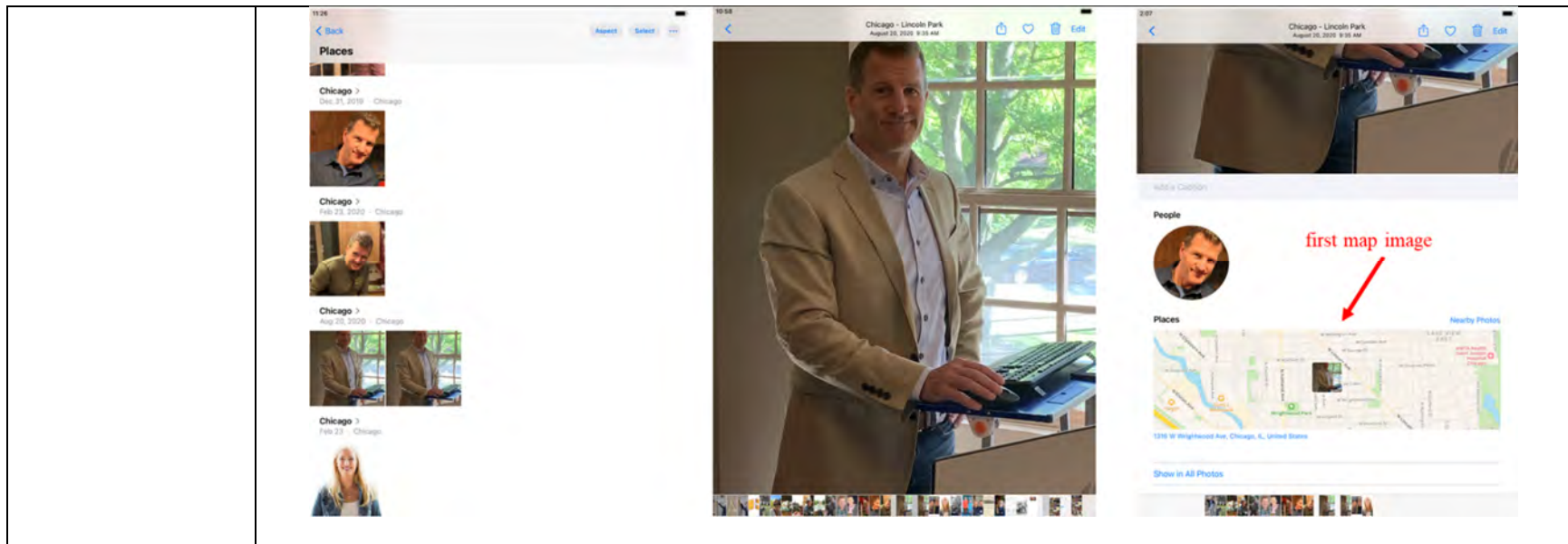
iPadOS displays a scaled replica of each of the digital photographs or images or videos in the first set of digital files.



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

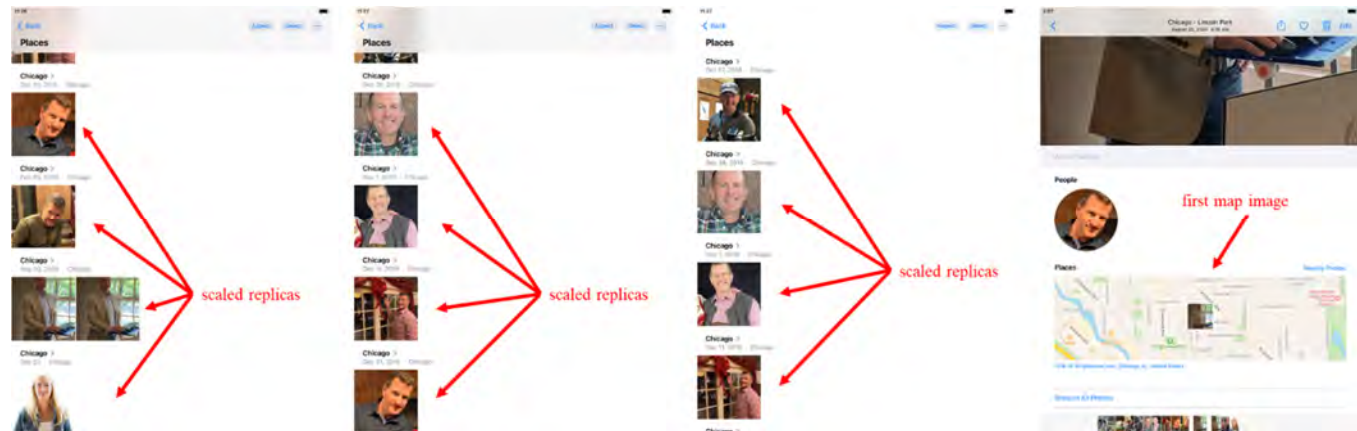
iPadOS displays a first map image indicating the geographic coordinates of the first geotag.

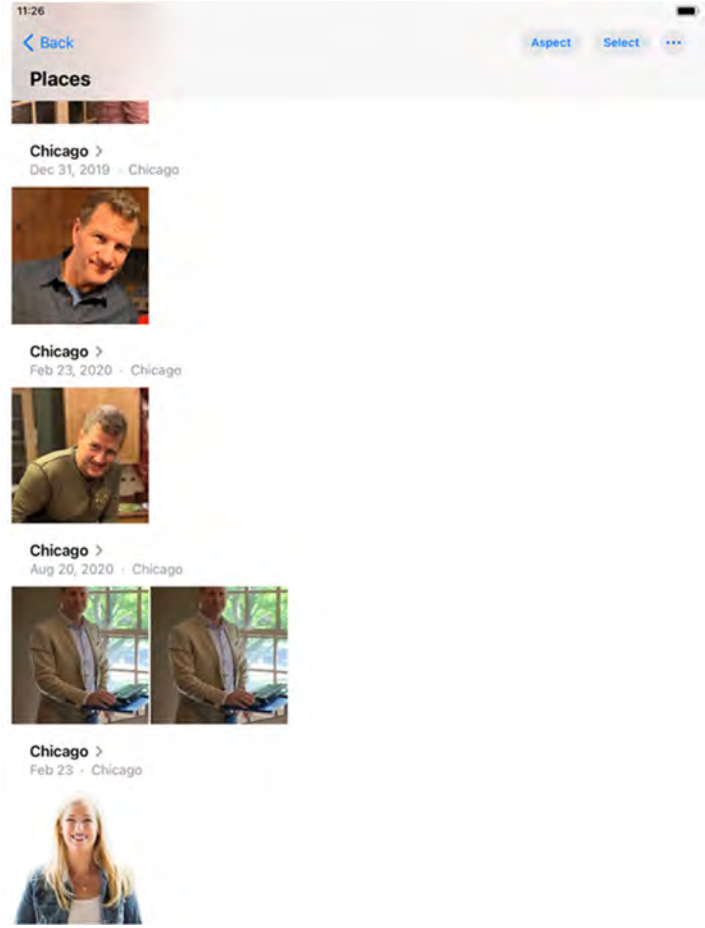
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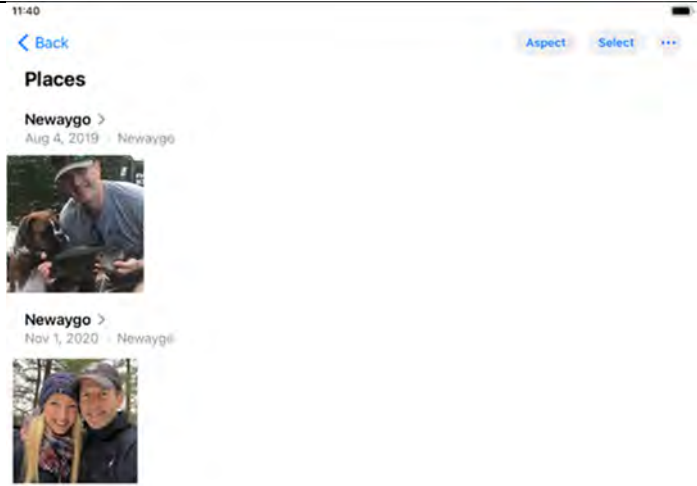



**1[c][iv]** the displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files are not overlaid on the first map image and

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.

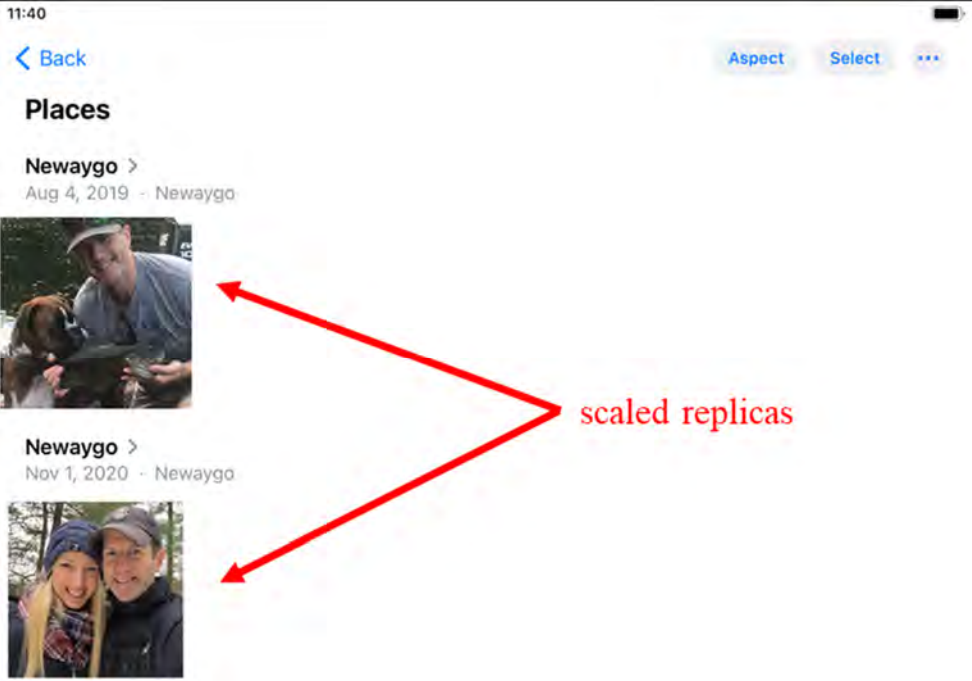




<p><b>1[c][v]</b> the second screenshot of the video display device not including the interactive map; and</p>	<p>The second screenshot of the video display device does not include the interactive map.</p>  <p>The screenshot shows an iPadOS interface titled 'Places' with a 'Back' button and 'Aspect', 'Select', and a menu icon. It displays a list of location-based photos from Chicago:</p> <ul style="list-style-type: none"> <li>Chicago &gt; Dec 31, 2019 · Chicago (photo of a man)</li> <li>Chicago &gt; Feb 23, 2020 · Chicago (photo of a man)</li> <li>Chicago &gt; Aug 20, 2020 · Chicago (photo of a man at a desk)</li> <li>Chicago &gt; Feb 23 · Chicago (photo of a woman)</li> </ul>
<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 menu icon. Below the title, there are two location tags from 'Newaygo'. The first tag is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second tag 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>



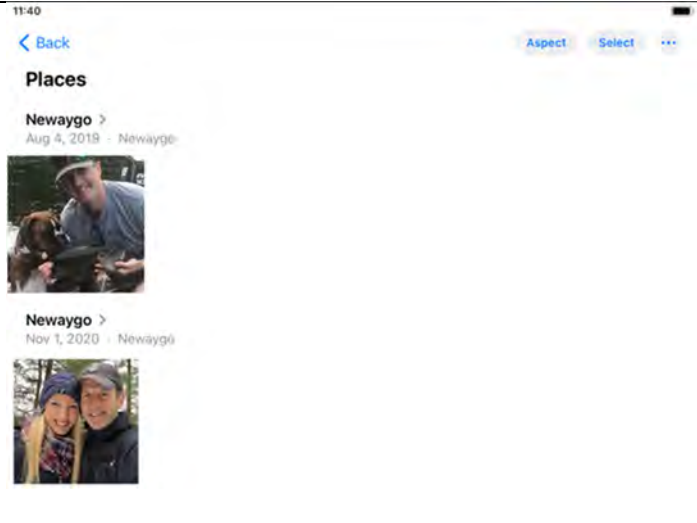
	 <p>11:40</p> <p>&lt; Back Aspect Select ...</p> <p><b>Places</b></p> <p><b>Newwaygo</b> &gt; Aug 4, 2019 - Newwaygo</p>  <p><b>Newwaygo</b> &gt; Nov 1, 2020 - Newwaygo</p>  <p>scaled replicas</p>
<p><b>1[d][iii]</b> (iii) a second map image indicating the geographic coordinates of the second geotag,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

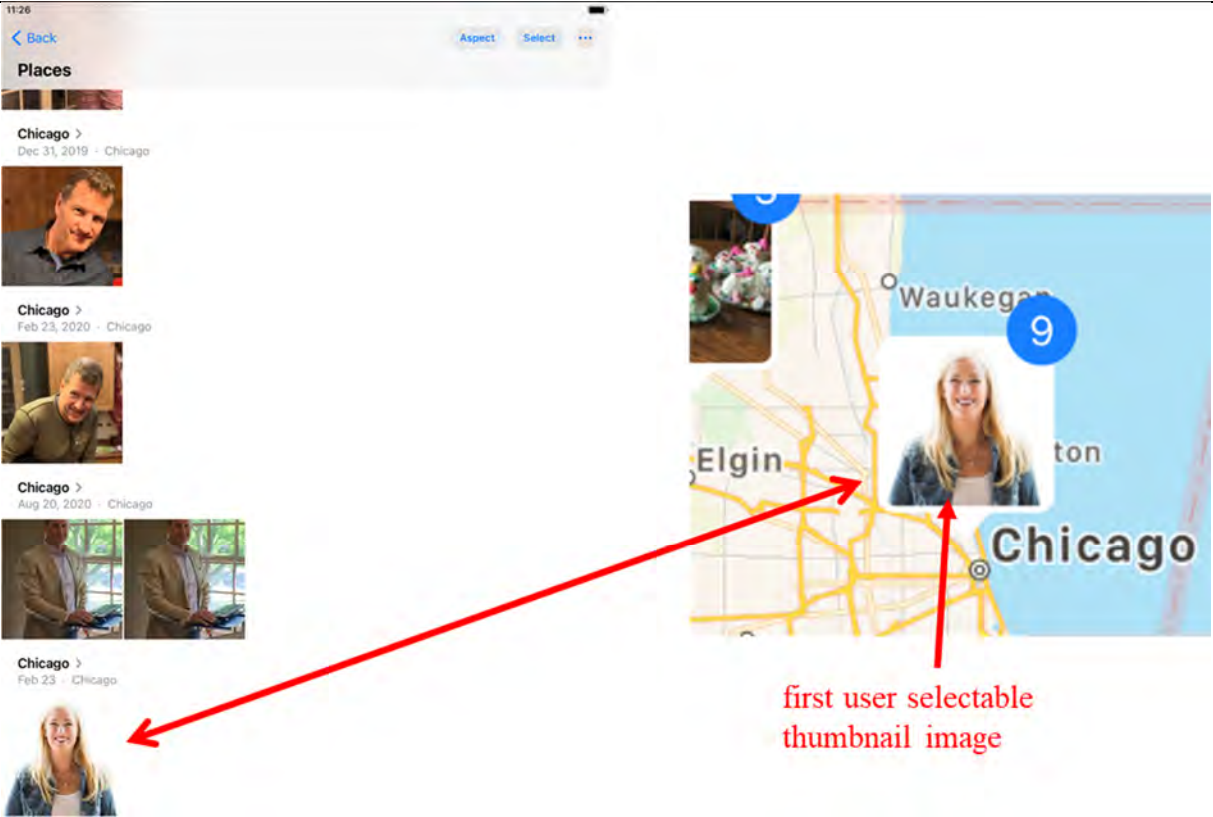
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<p><b>1[d][iv]</b> the displayed scaled replicas of each of the digital photographs or images or videos in the second set of digital files not being overlaid on the second map image and</p>	<p>The displayed scaled replicas of each of the digital photographs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

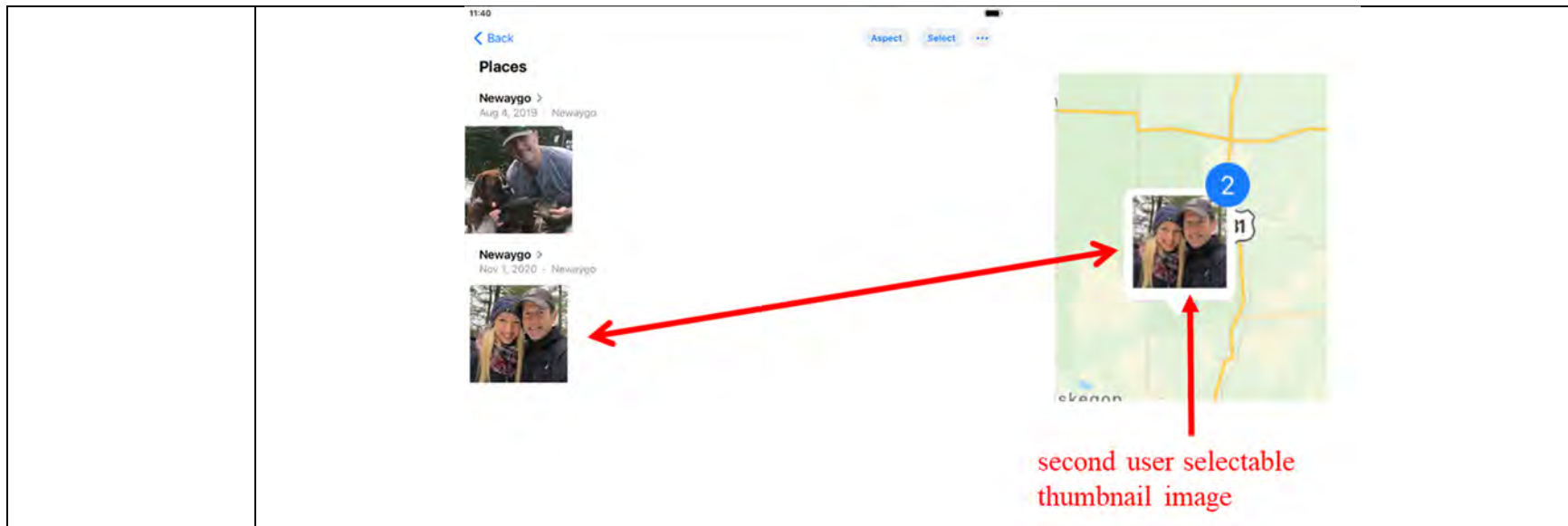
<p><b>1[d][v]</b> the third screenshot of the video display device not including the interactive map.</p>	<p>The third screenshot of the video display device does not include the interactive map.</p>

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	 <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>11:26 Back Aspect Select ...</p> <p>Places</p> <p>Chicago &gt; Dec 31, 2019 · Chicago</p> <p>Chicago &gt; Feb 23, 2020 · Chicago</p> <p>Chicago &gt; Aug 20, 2020 · Chicago</p> <p>Chicago &gt; Feb 23 · Chicago</p> <p>Waukegan 9 Elgin ton Chicago</p> <p>first user selectable thumbnail image</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>

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# **Exhibit A.3**

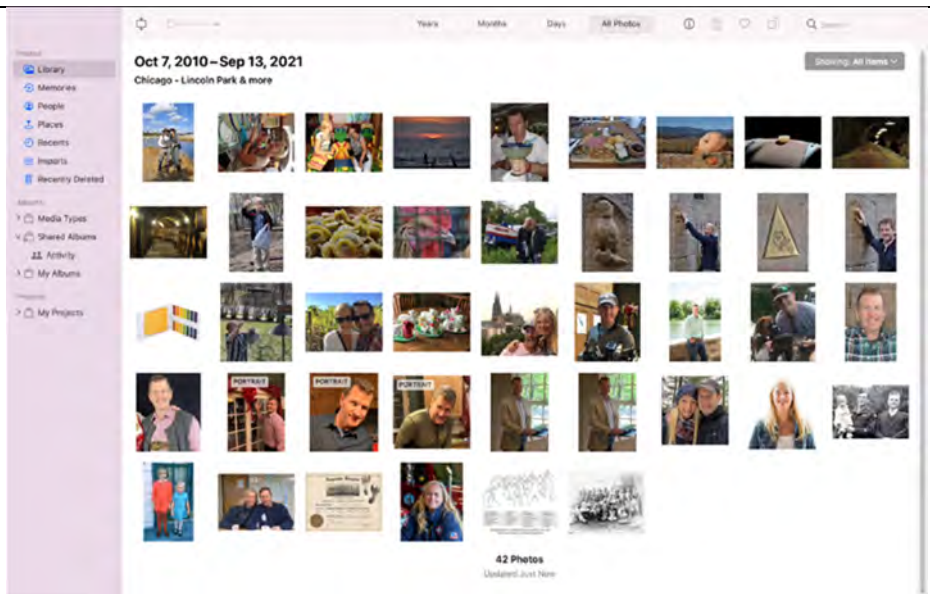
**U.S. Patent No. 9,552,376 – Infringement Claim Chart**

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

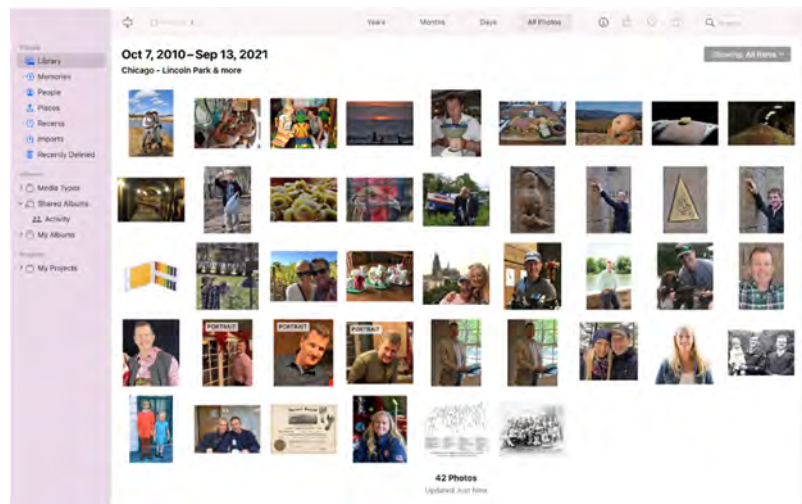


Macintosh HD - 57.23 GB available of 250.79 GB

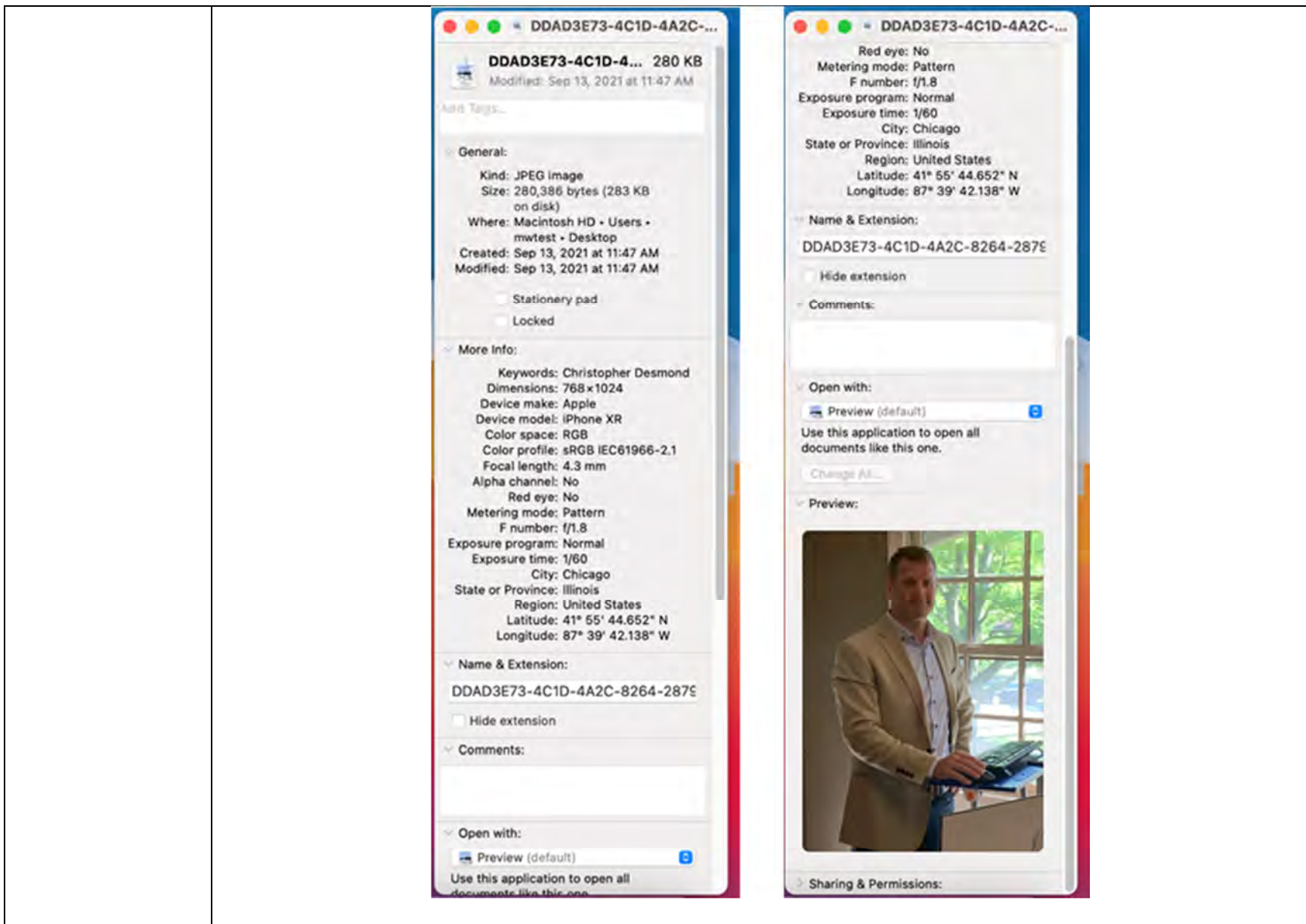


**1[a][i]** each of the digital files having embedded therein content data and metadata including tags, the content data including a digital photograph or image or video, the metadata including a geotag indicative of geographic coordinates where the digital photograph or image or video was taken;

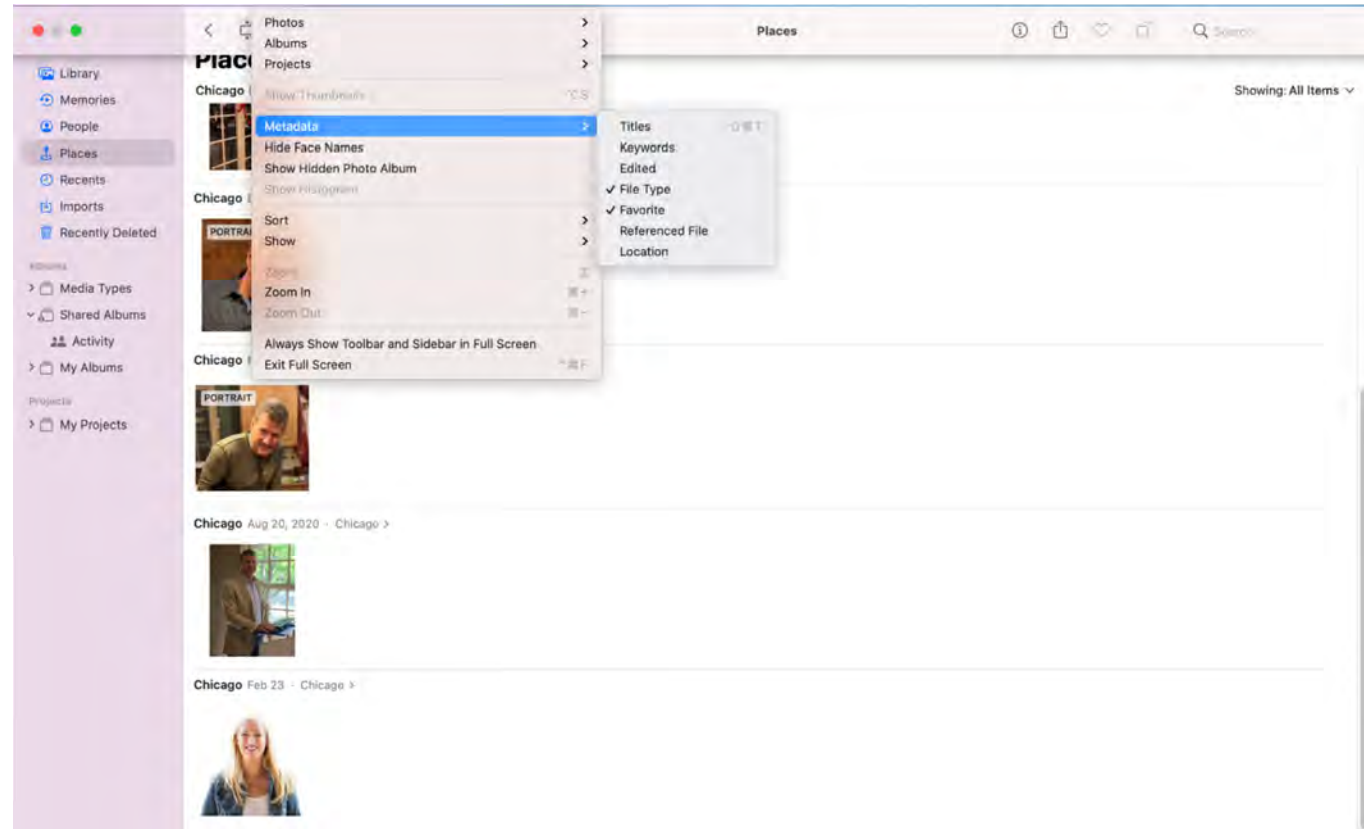
Each of the digital files having embedded therein content data and metadata including tags. The content data includes a digital photograph or image or video. Exemplary content data (digital photograph, image, or video) is shown below.



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.



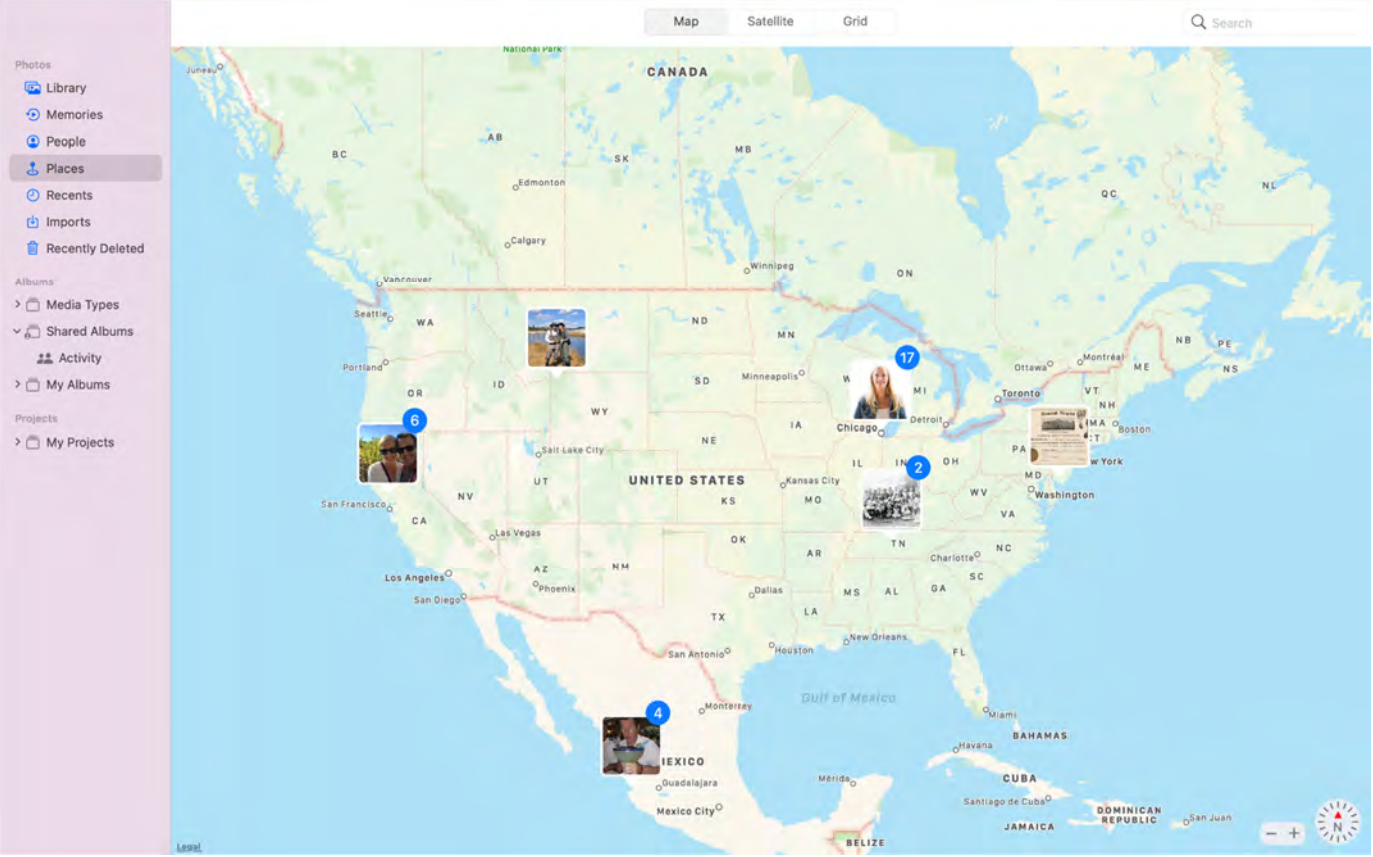
Additionally, the macOS Photos application displays metadata (including location information) for a given digital file.



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

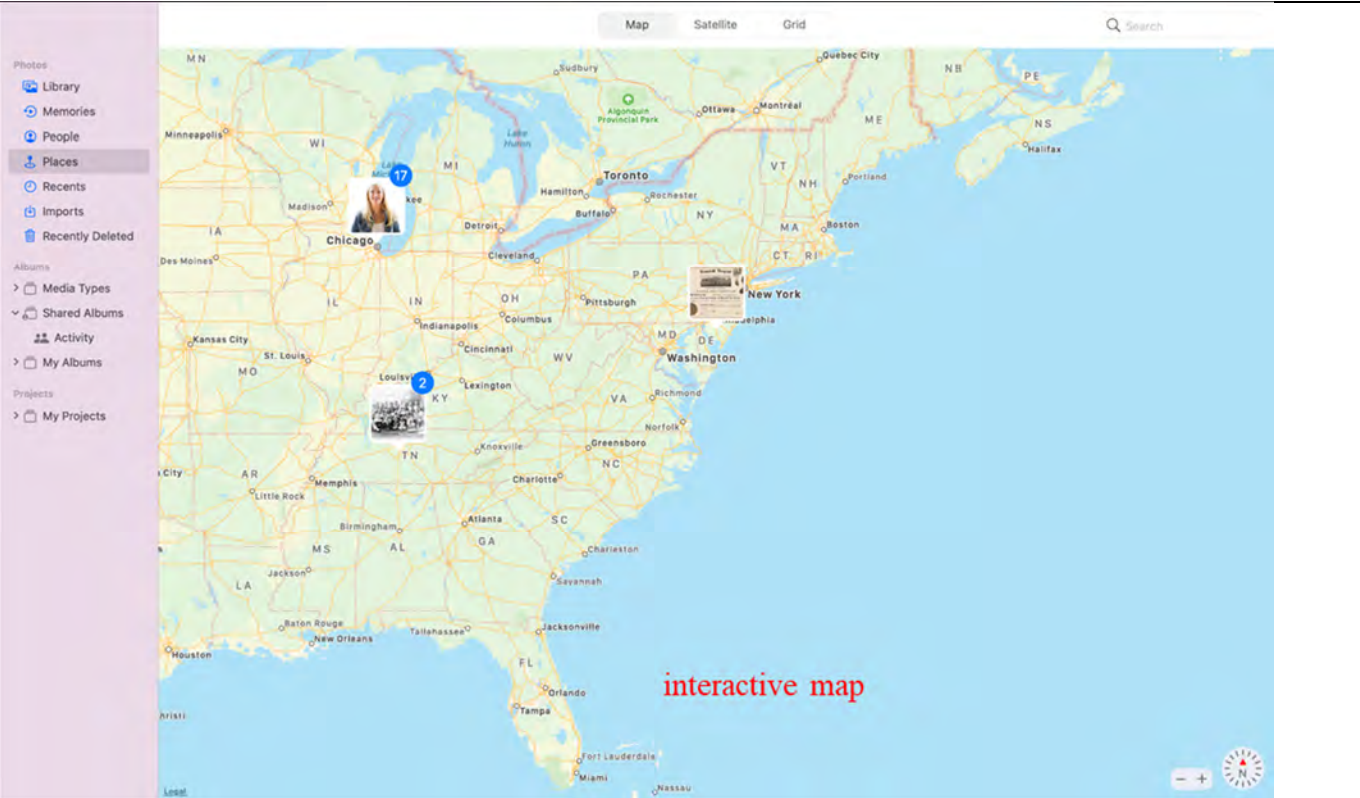
macOS displays a map view on a video display device (e.g., an Apple MacBook).

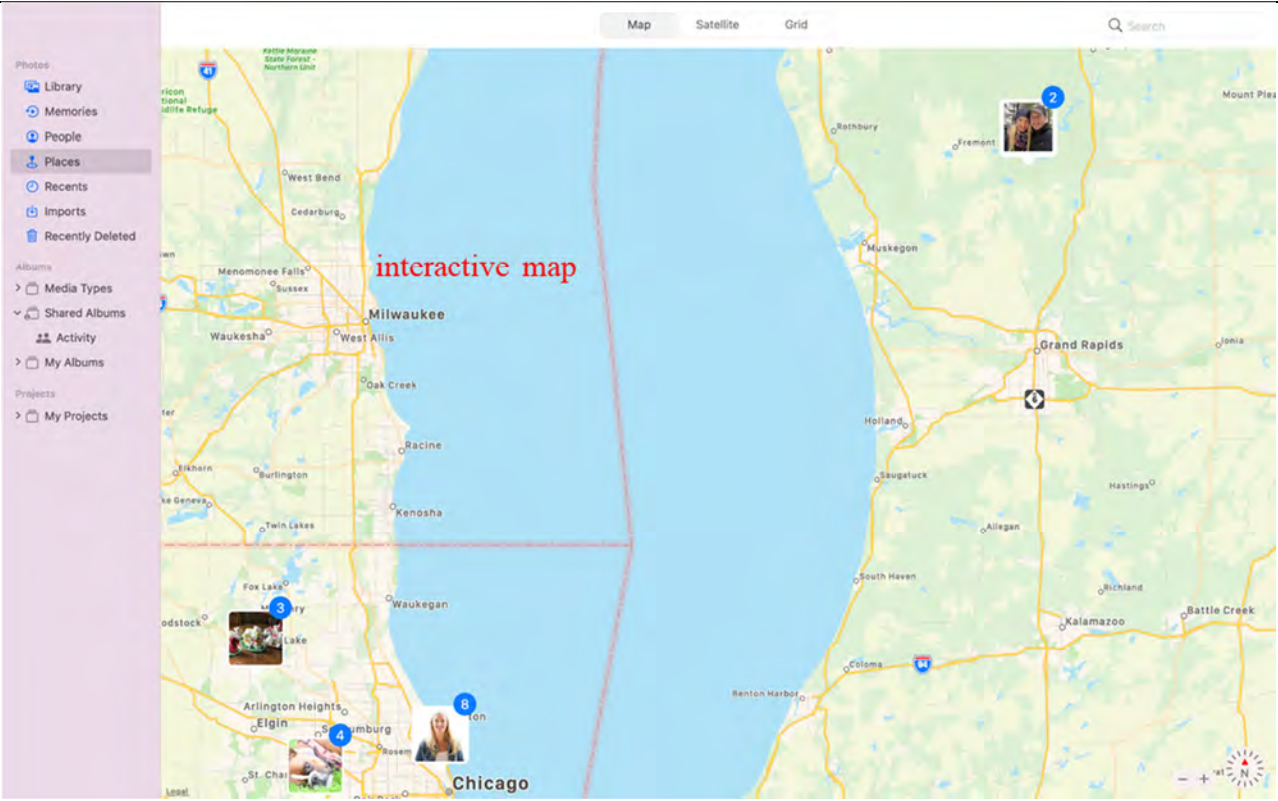
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	
<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

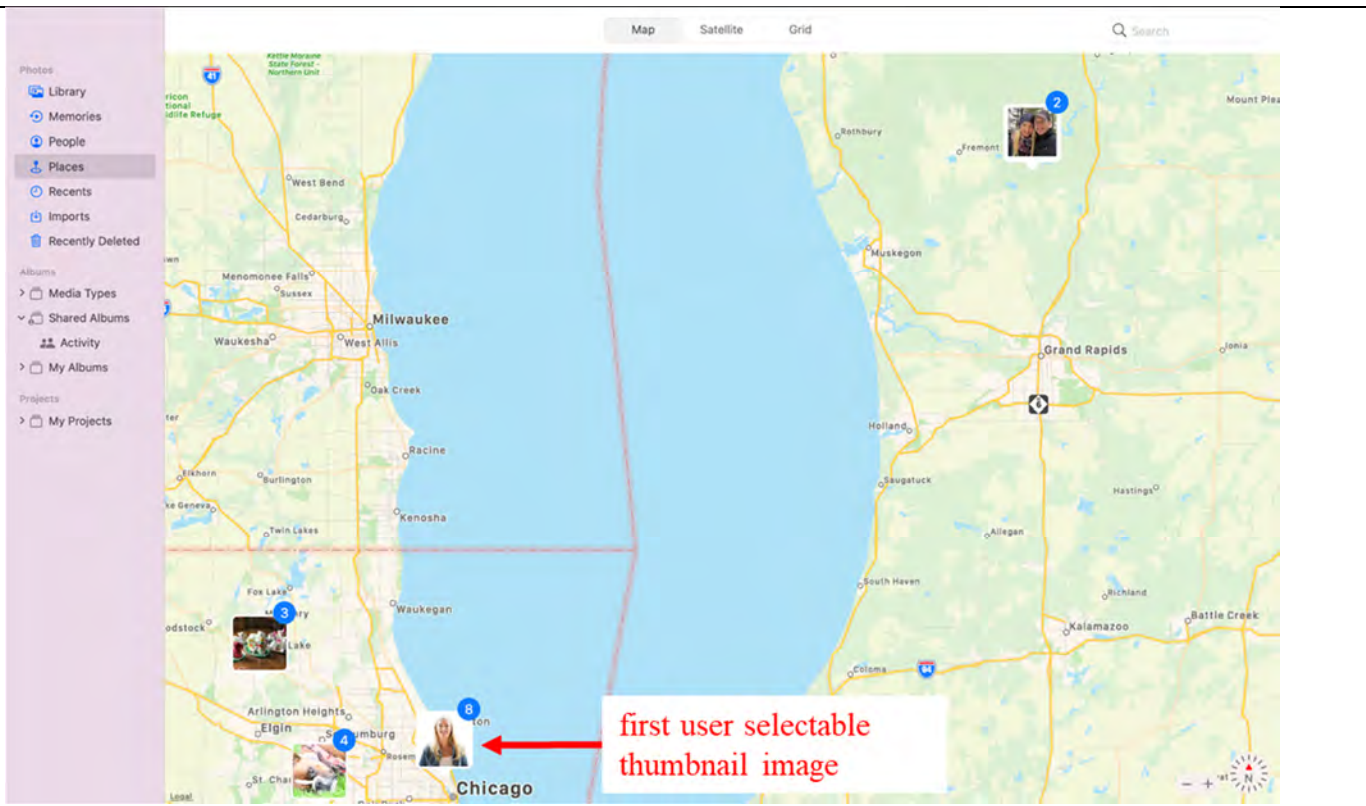
of the video display device;



	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Photos, Library, Memories, People, Places (highlighted), 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 is drawn over the map, labeled "interactive map" in red text. 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 a search bar, map style selector (Map, Satellite, Grid), 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

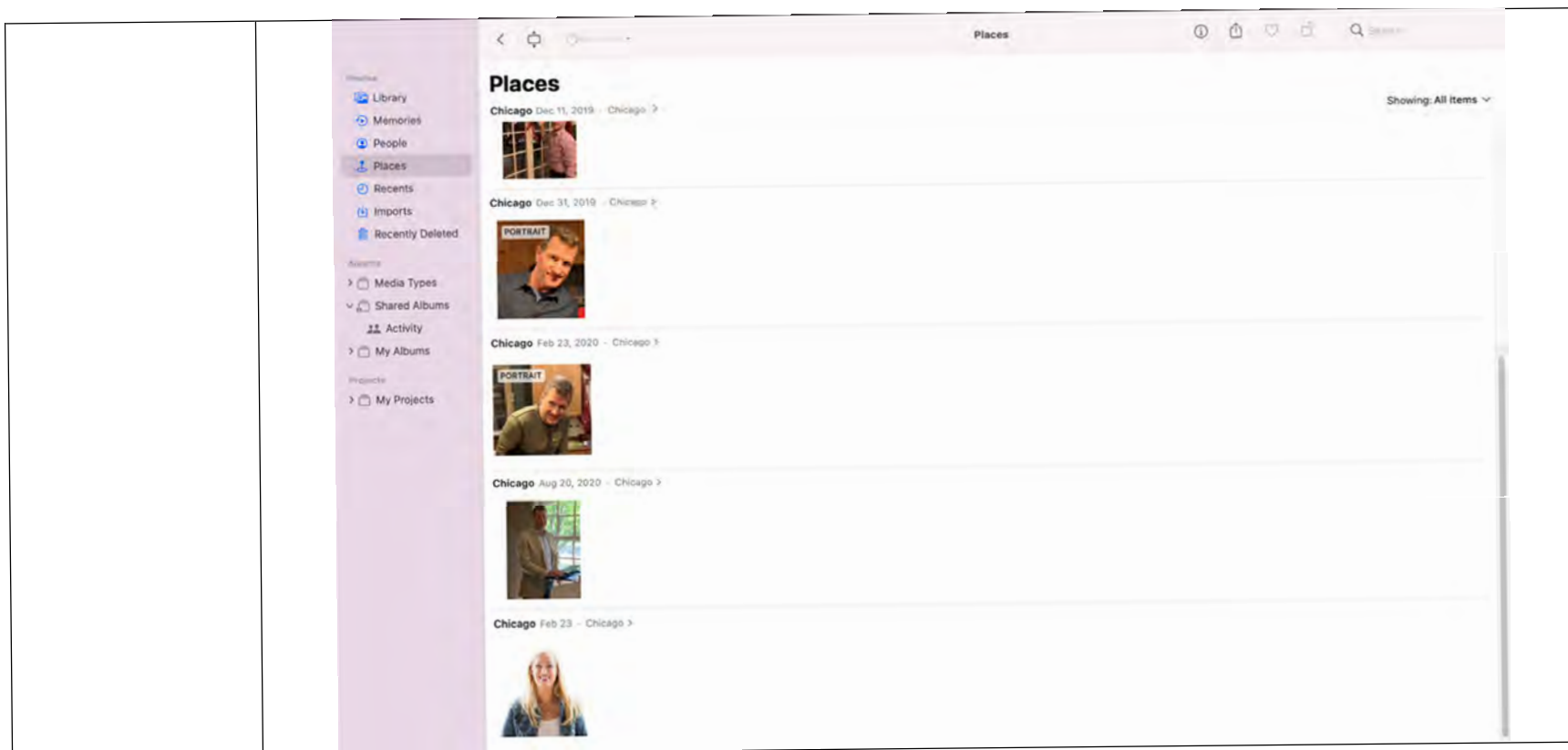
including all of the digital files having the first geotag;

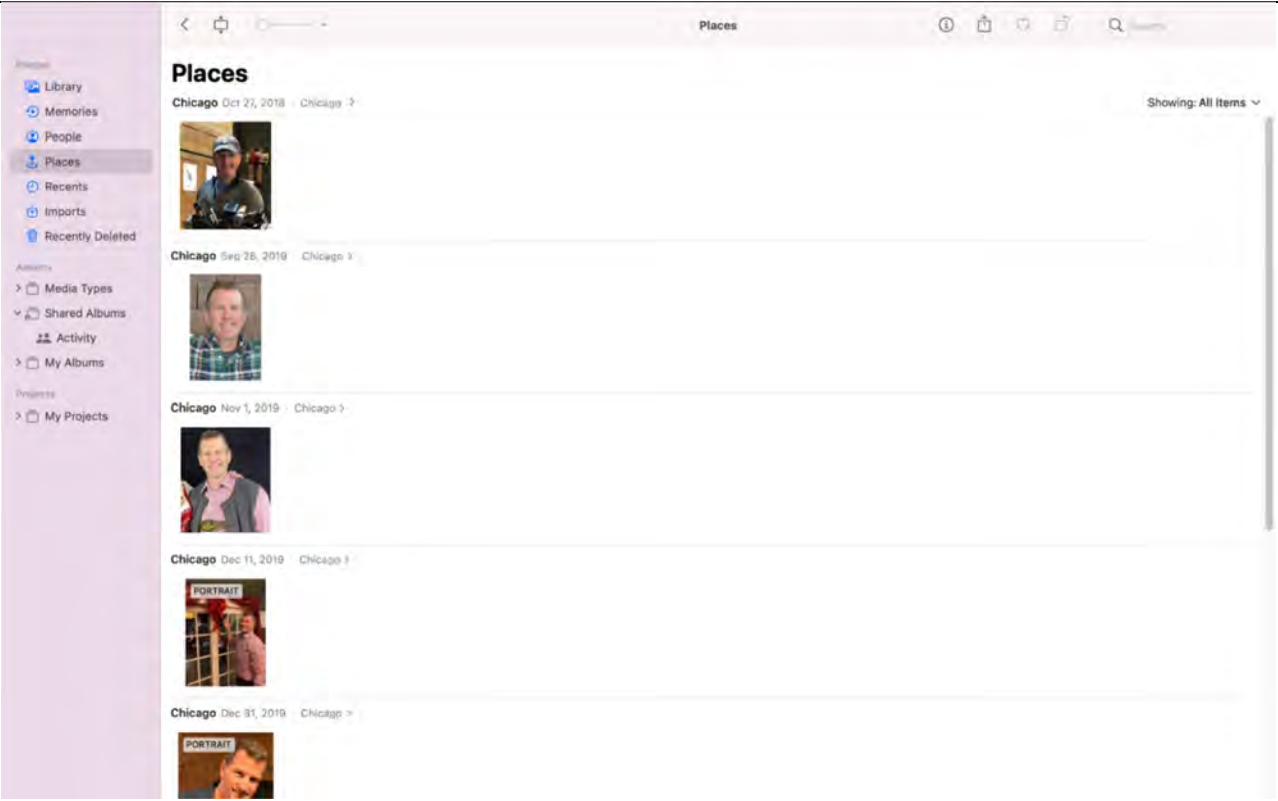


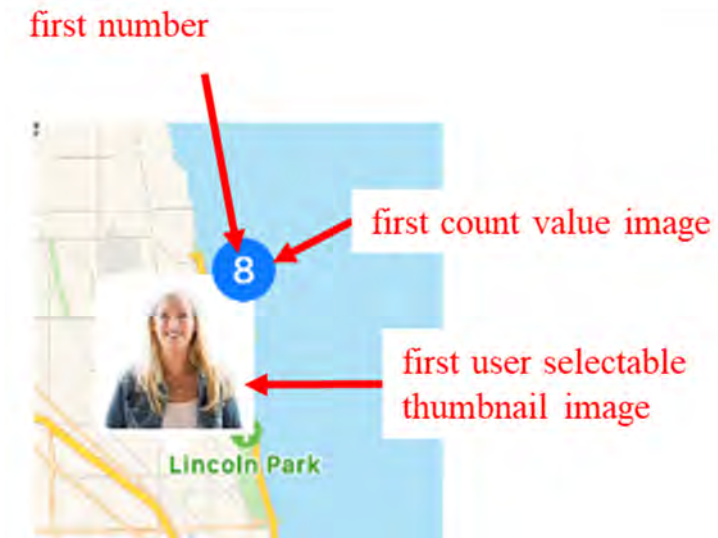
macOS stores a first set of digital files includes all of the digital files having the first geotag. *See also* information for limitation 1[a].



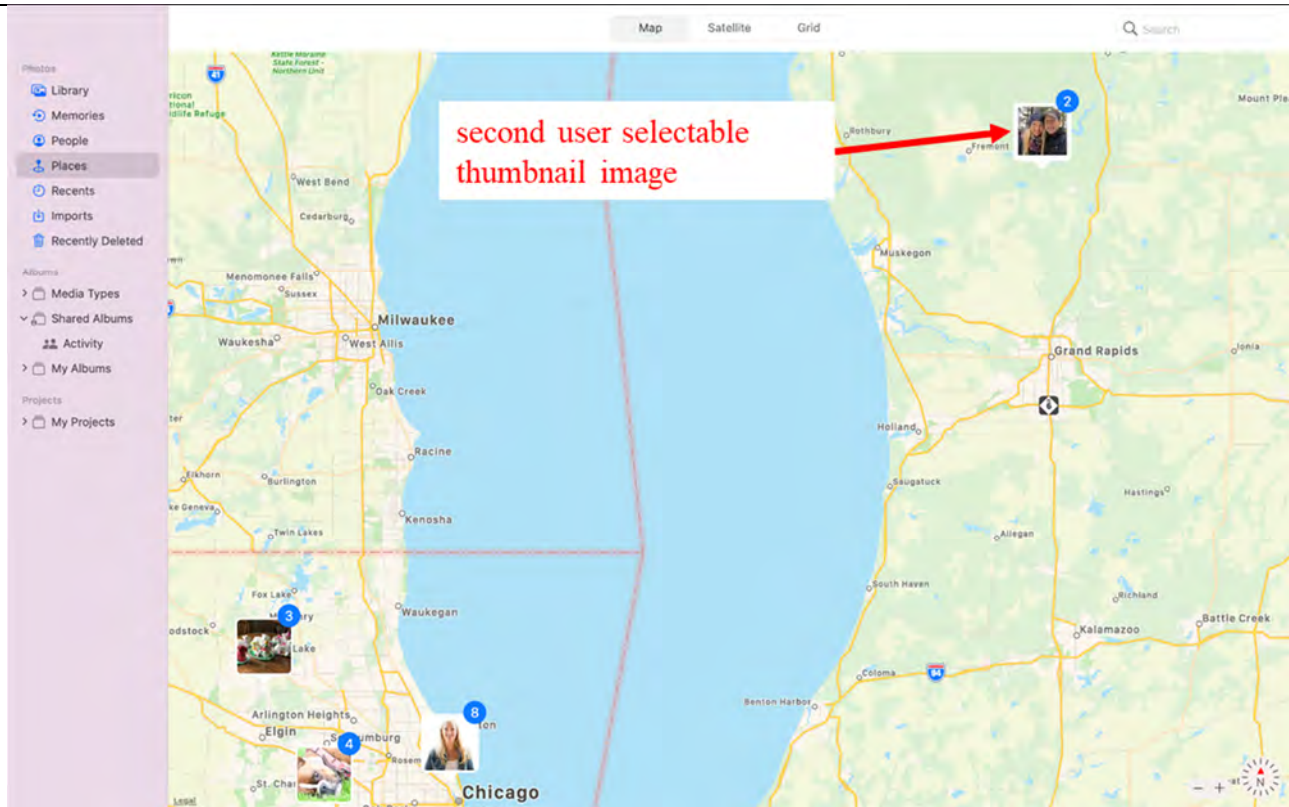
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS



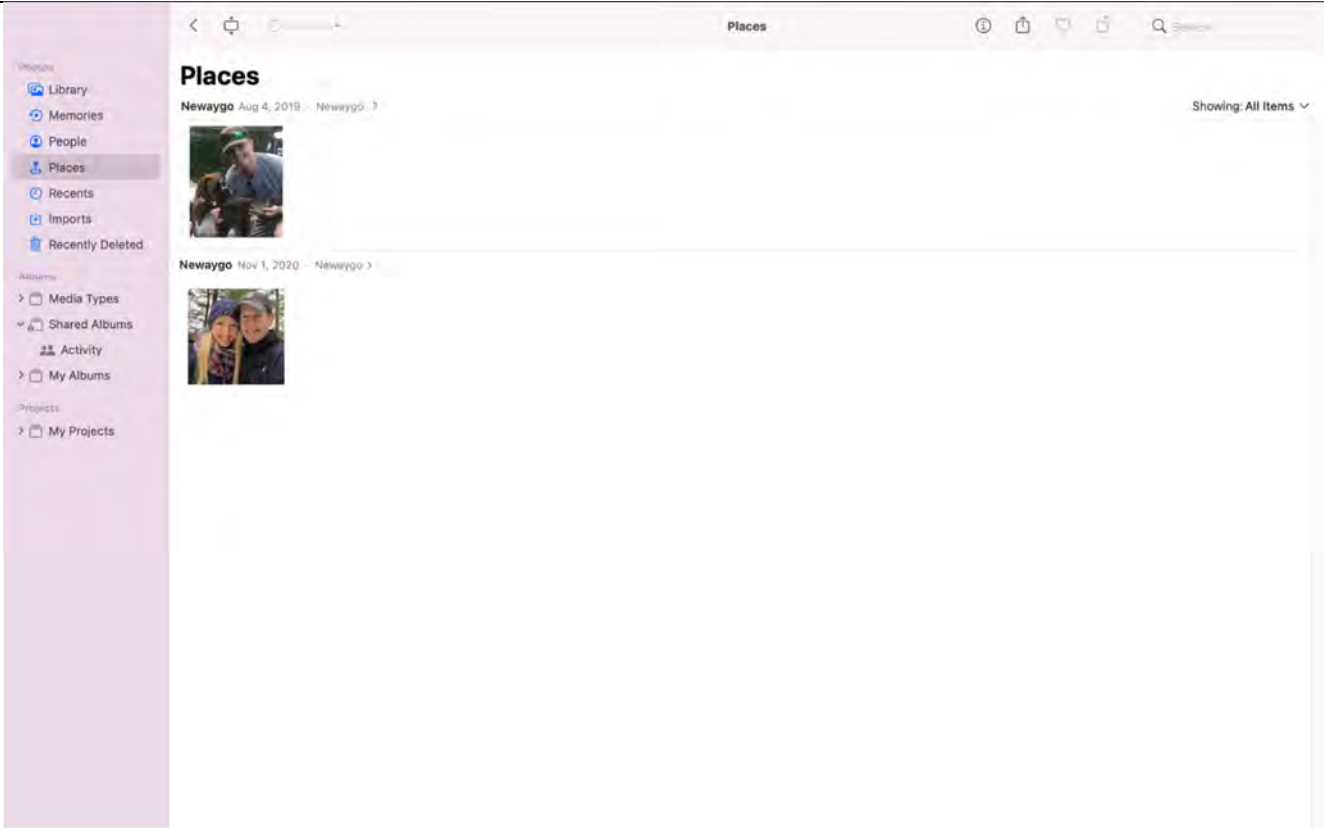
	
<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping or directly connected to the first user selectable thumbnail image, the first count value image including a first</p>	<p>macOS displays a first count value image partially overlapping or directly connected to the first user selectable 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>

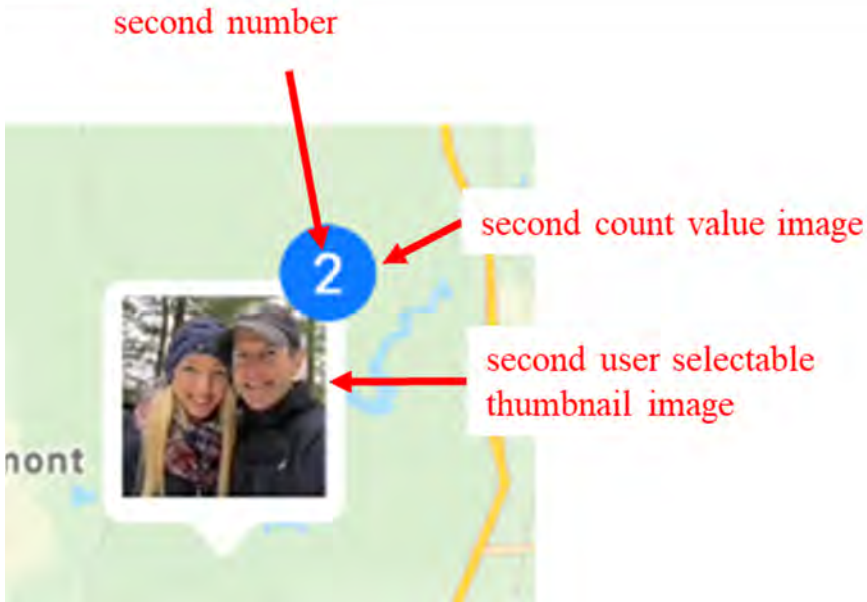
<p>number that corresponds to the number of digital photographs or images or videos in the first set of digital files;</p>	 <p>The image shows a map interface with a geotag. A red arrow labeled "first number" points to a blue circle containing the number "8". Another red arrow labeled "first count value 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

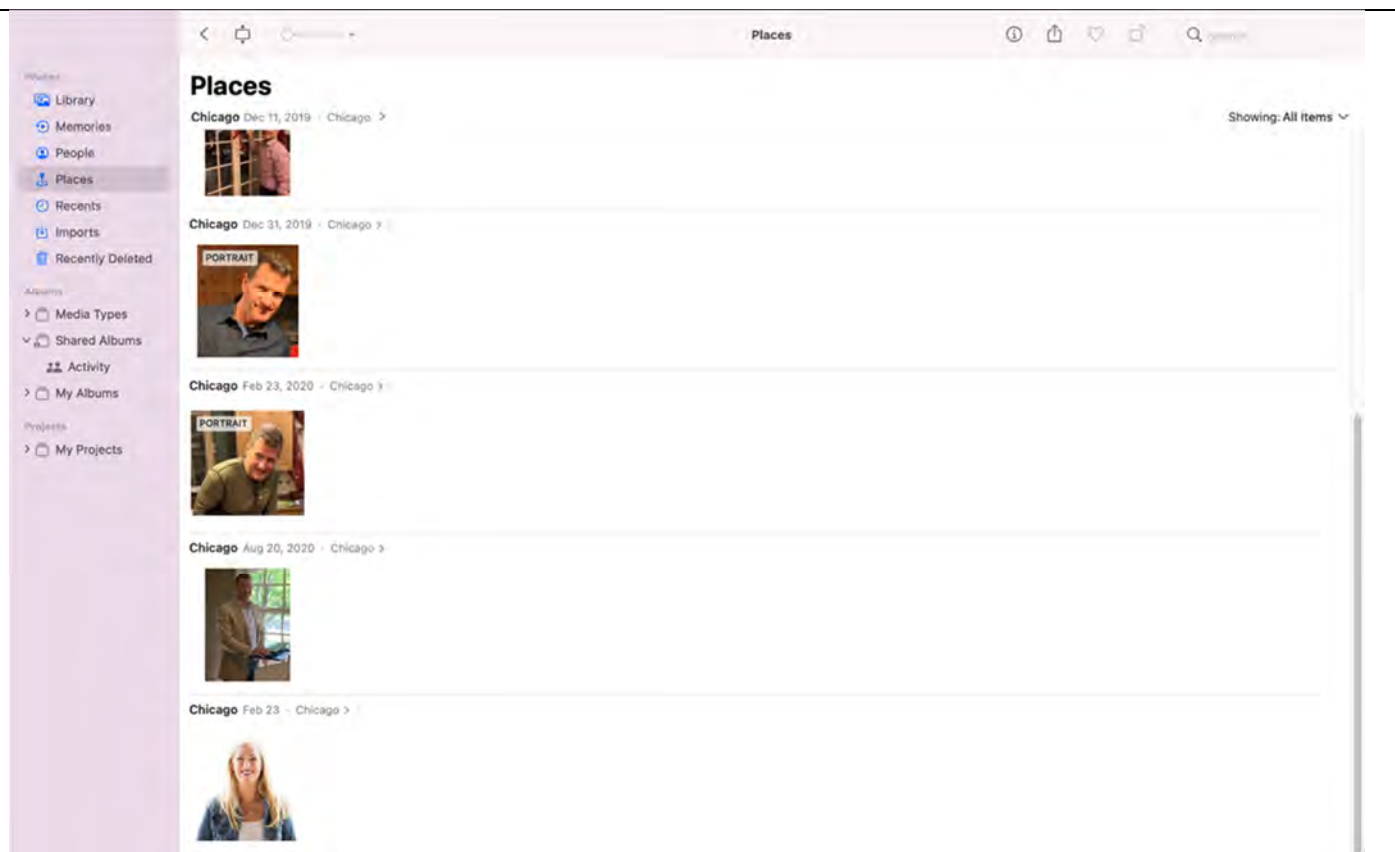


macOS stores a second set of digital files includes all of the digital files having the second geotag. *See also* information for limitation 1[a].

	
<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>

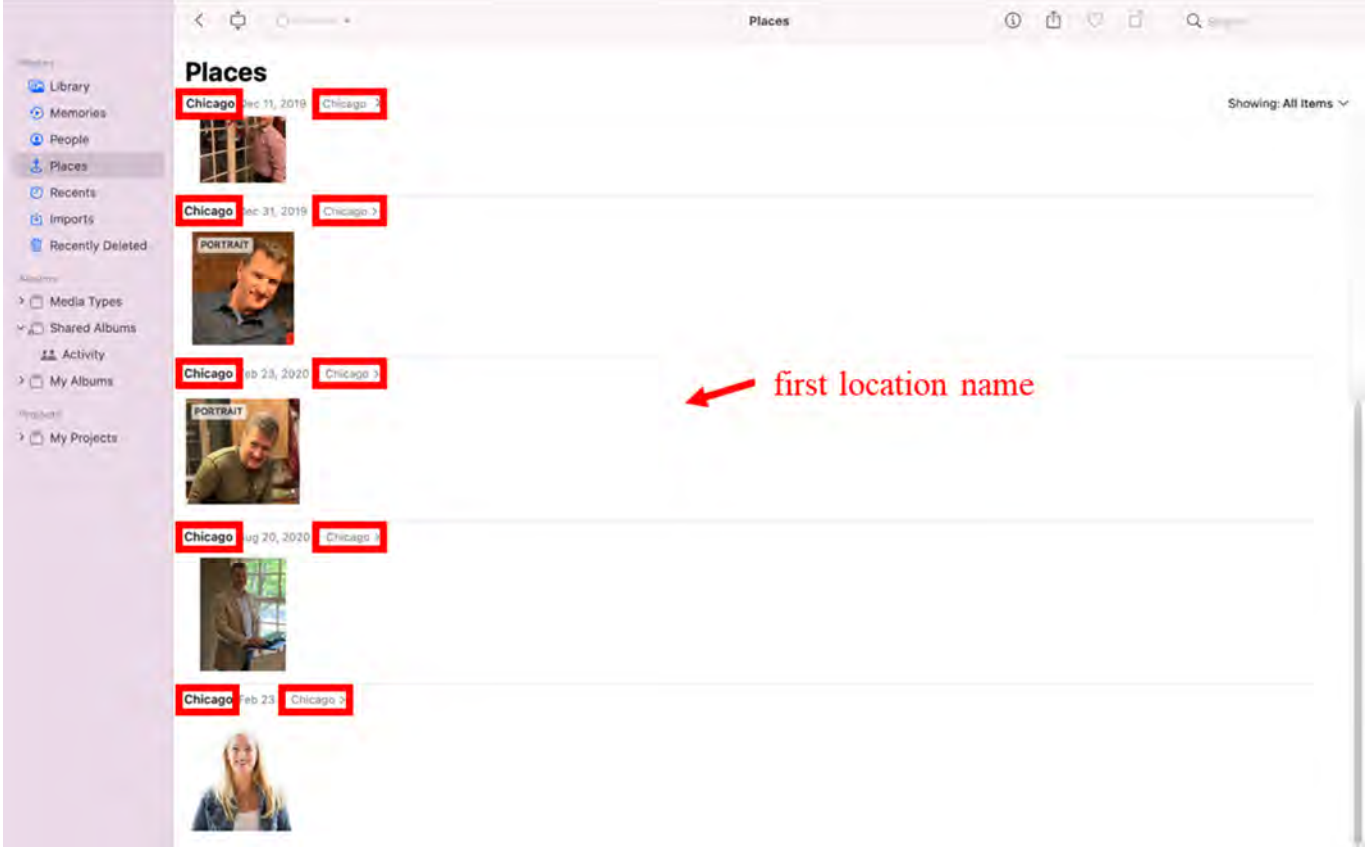
<p>including a second number that corresponds to the number of digital photographs or images or videos in the second set of digital files;</p>	 <p>The diagram illustrates a user interface element on a map. A red arrow labeled "second number" points to a blue circle containing the number "2". Another 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



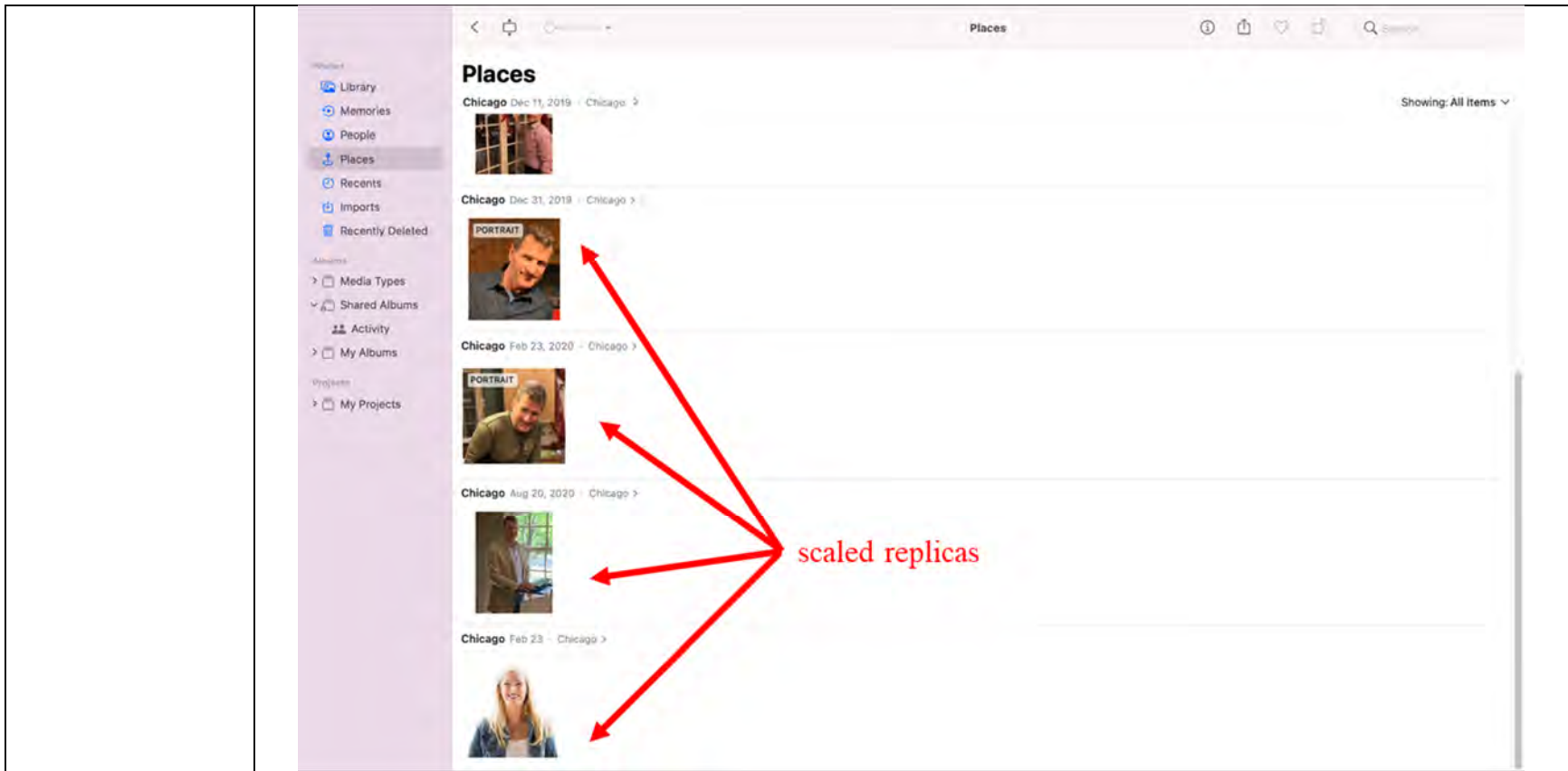
**1[c][i]** (i) a first location name corresponding to the first geotag,

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

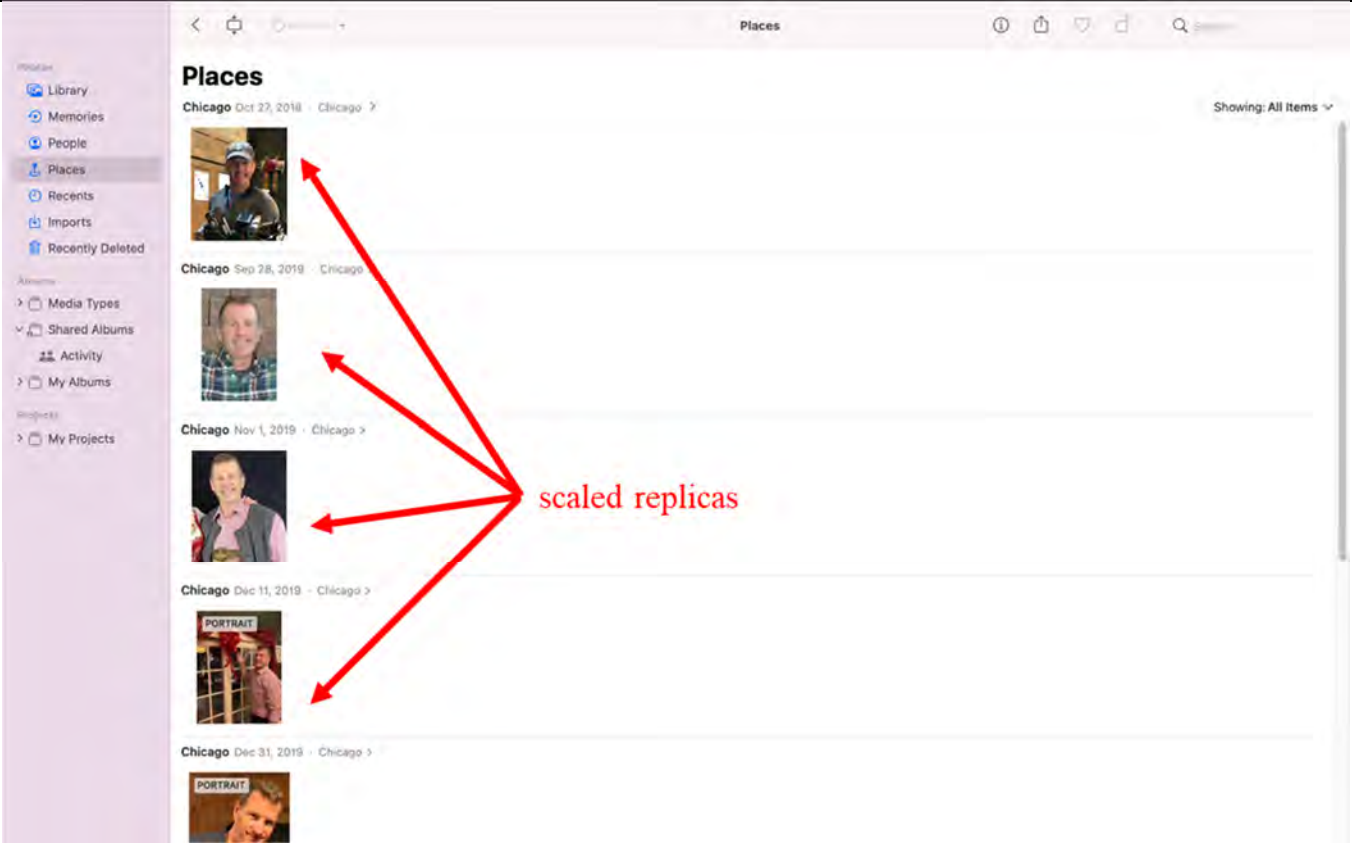
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options like Library, Memories, People, Places, Recents, Imports, and Recently Deleted. The main area is titled 'Places' and displays a vertical list of photo thumbnails. Each thumbnail has a red 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>



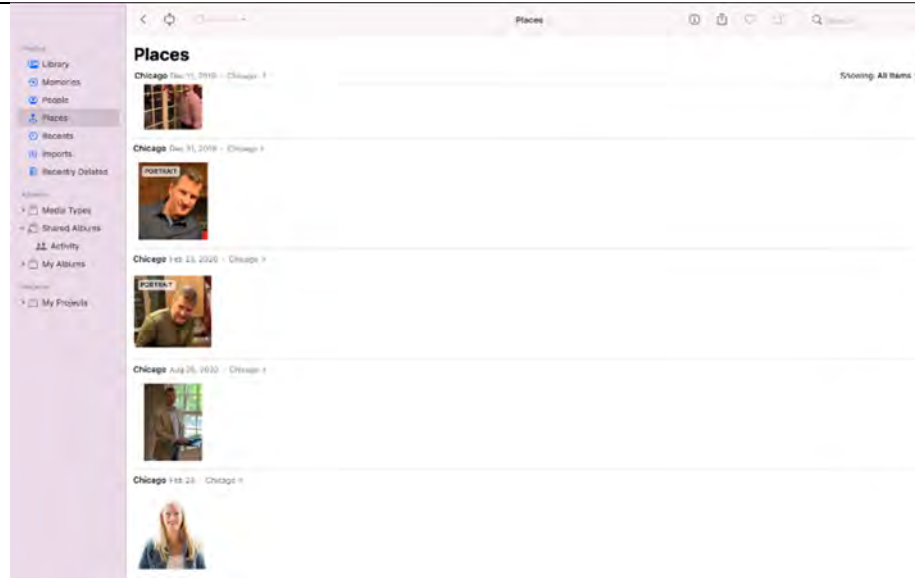
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

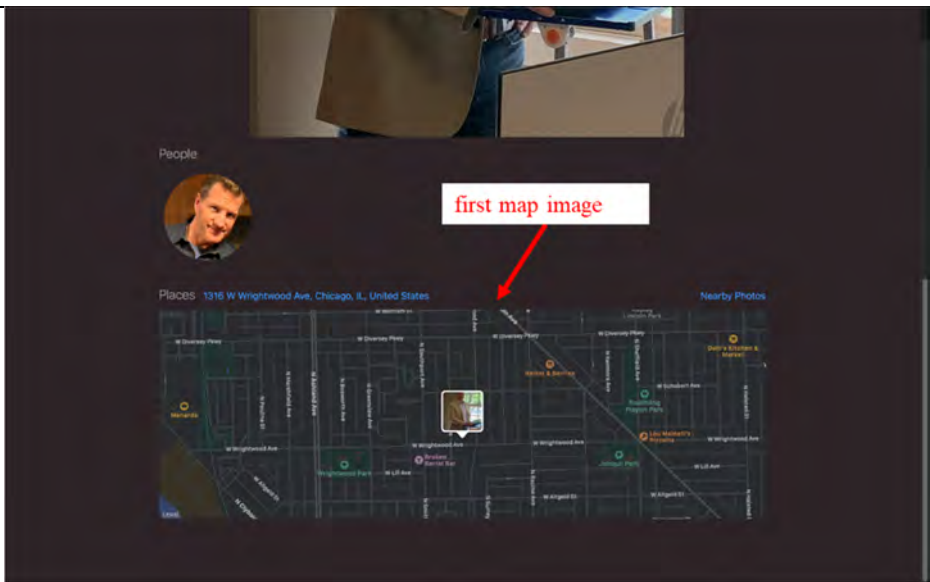


Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

	 <p>The screenshot shows the 'Places' section of the macOS Photos app. On the left is a sidebar with 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 the 'Chicago' location, with dates ranging from Oct 22, 2018, to Dec 31, 2019. Four red arrows originate from the text 'scaled replicas' on the right and point to the first four photo thumbnails 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>

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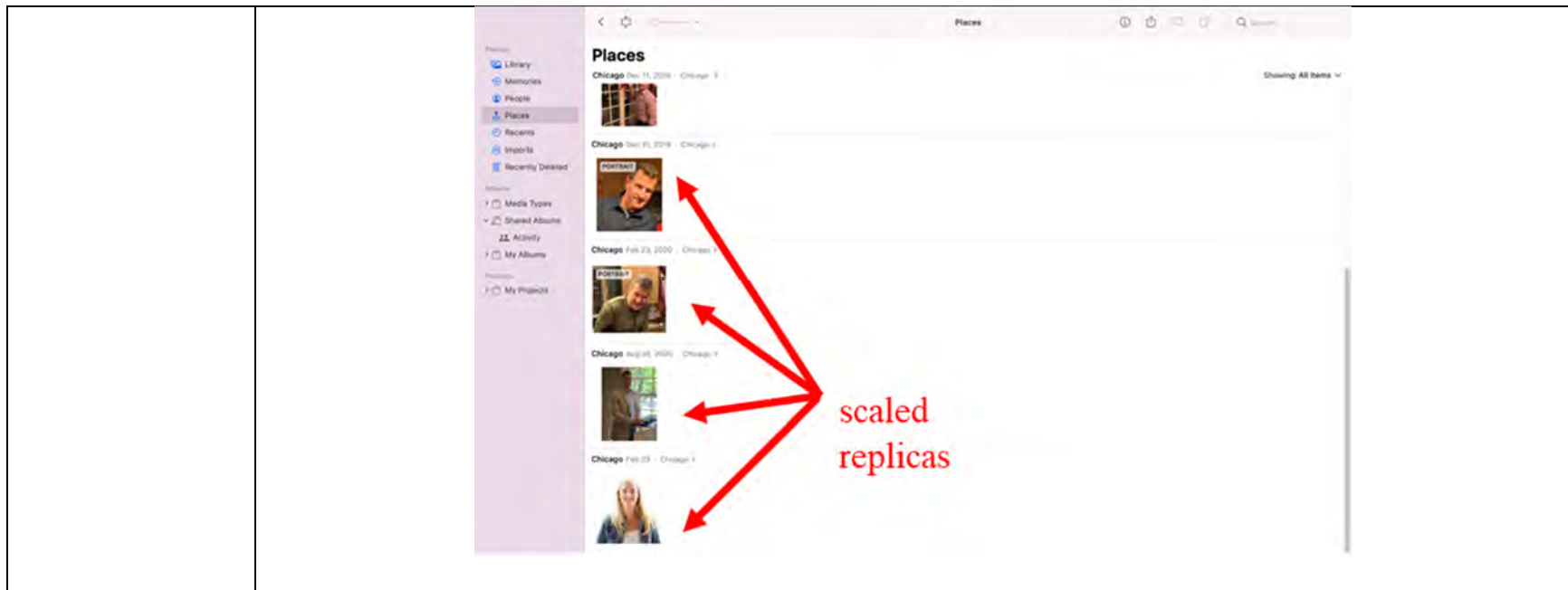




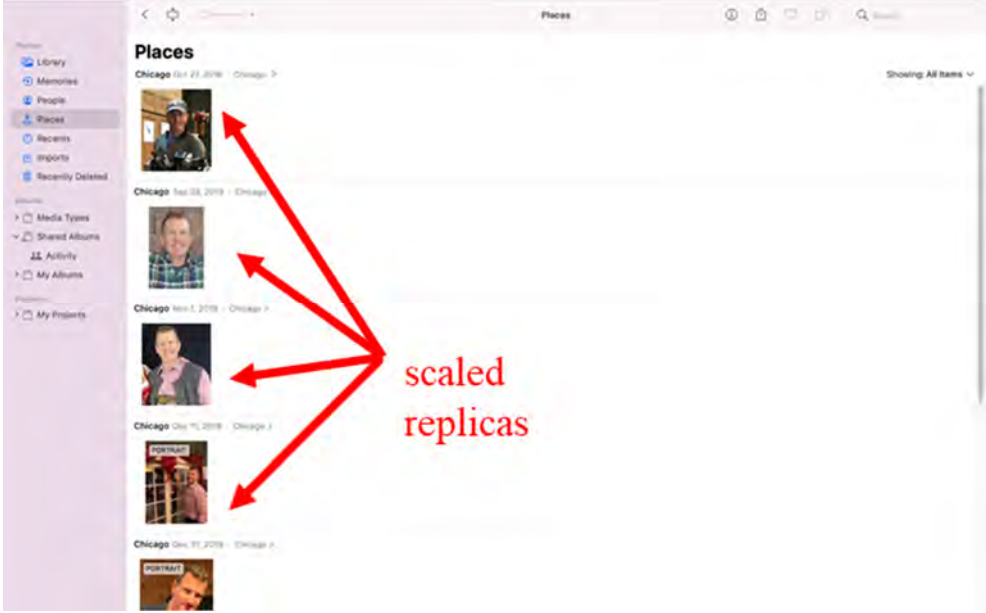
**1[c][iv]** the displayed scaled replicas of each of the digital photographs or images or videos in the first set of digital files not being overlaid on the first map image and

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.

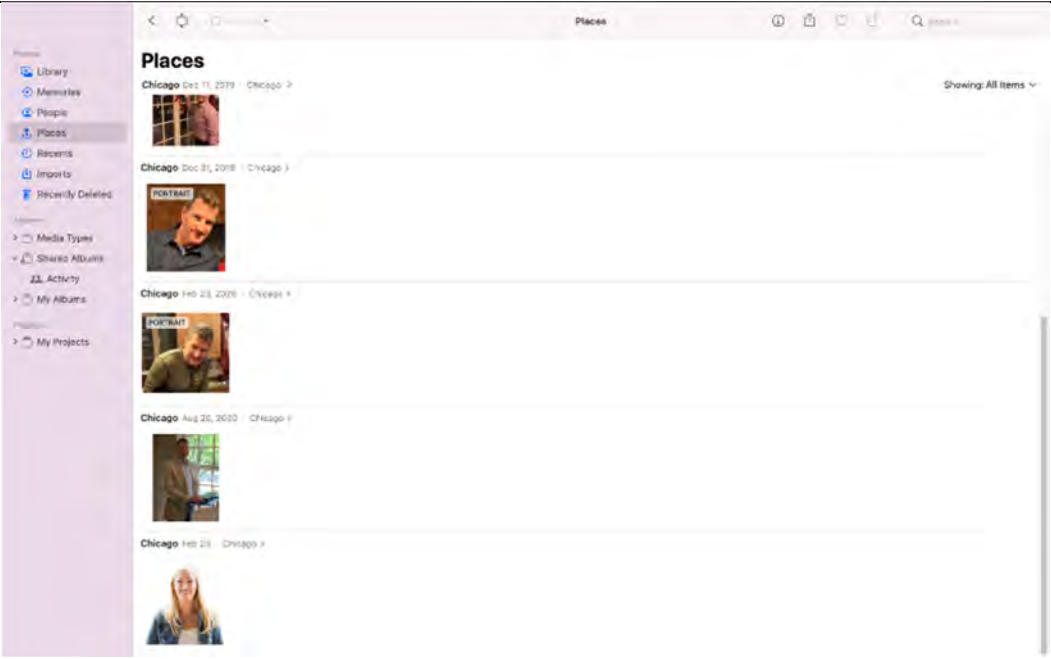
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

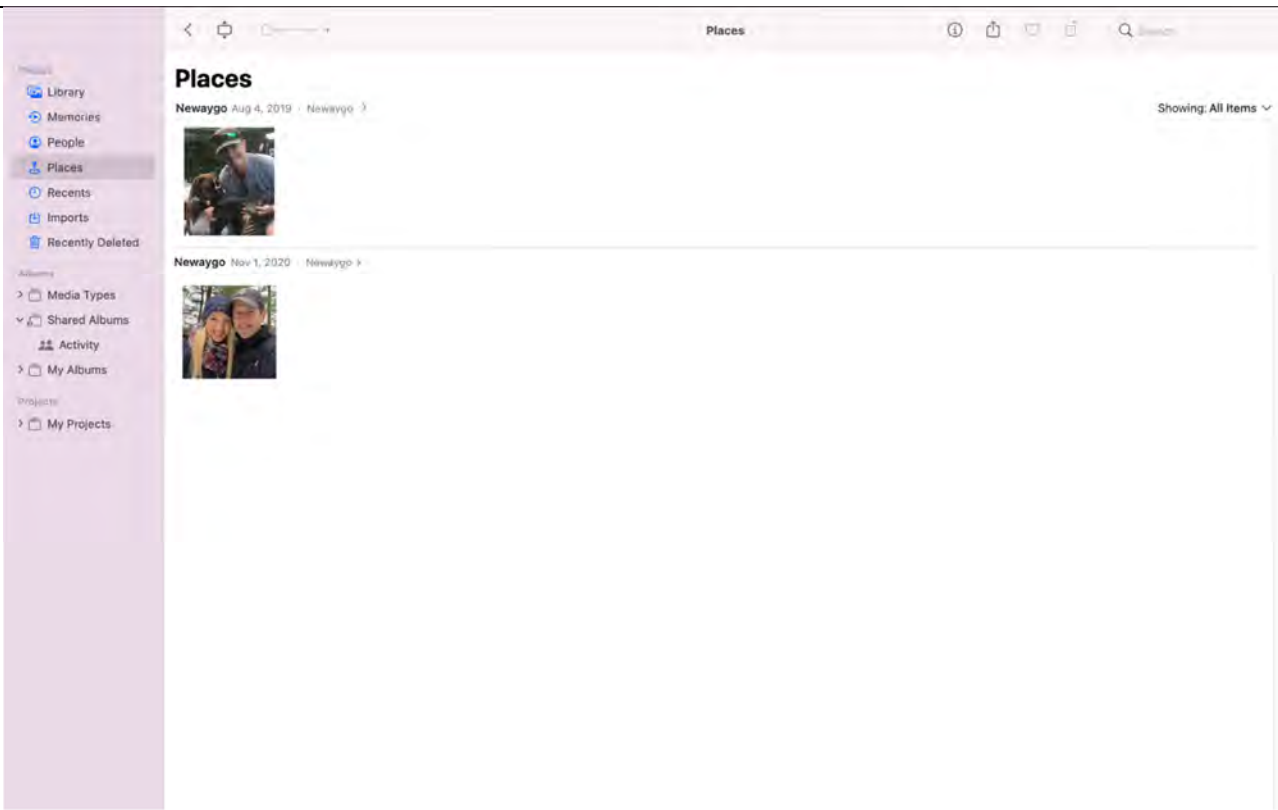


Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

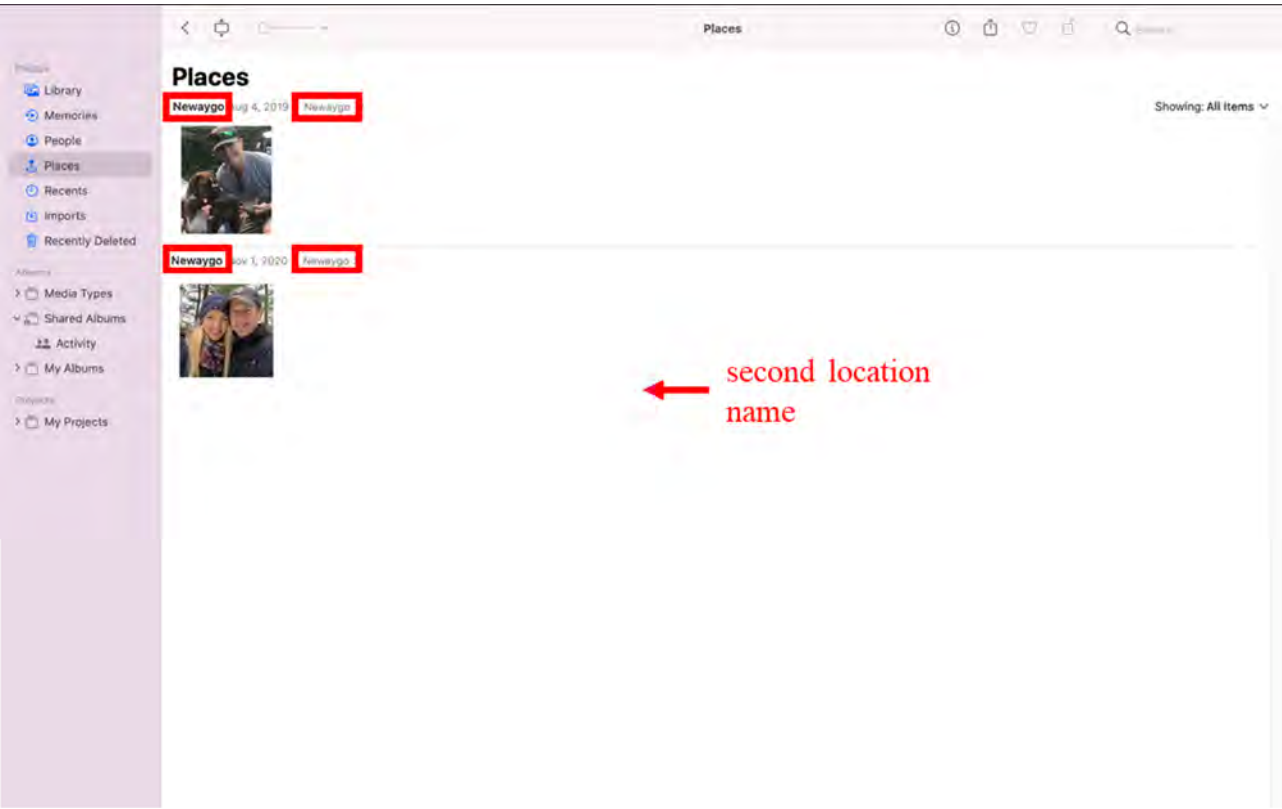
	 <p>The screenshot shows the 'Places' section of the Photos app. The left sidebar contains navigation options like Library, Memories, People, Places, Recents, Imports, and Recently Deleted. The main area displays a list of photo thumbnails for the location 'Chicago'. Each thumbnail includes a date and a location tag. Red arrows point from the text 'scaled replicas' to several of these thumbnails, indicating 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

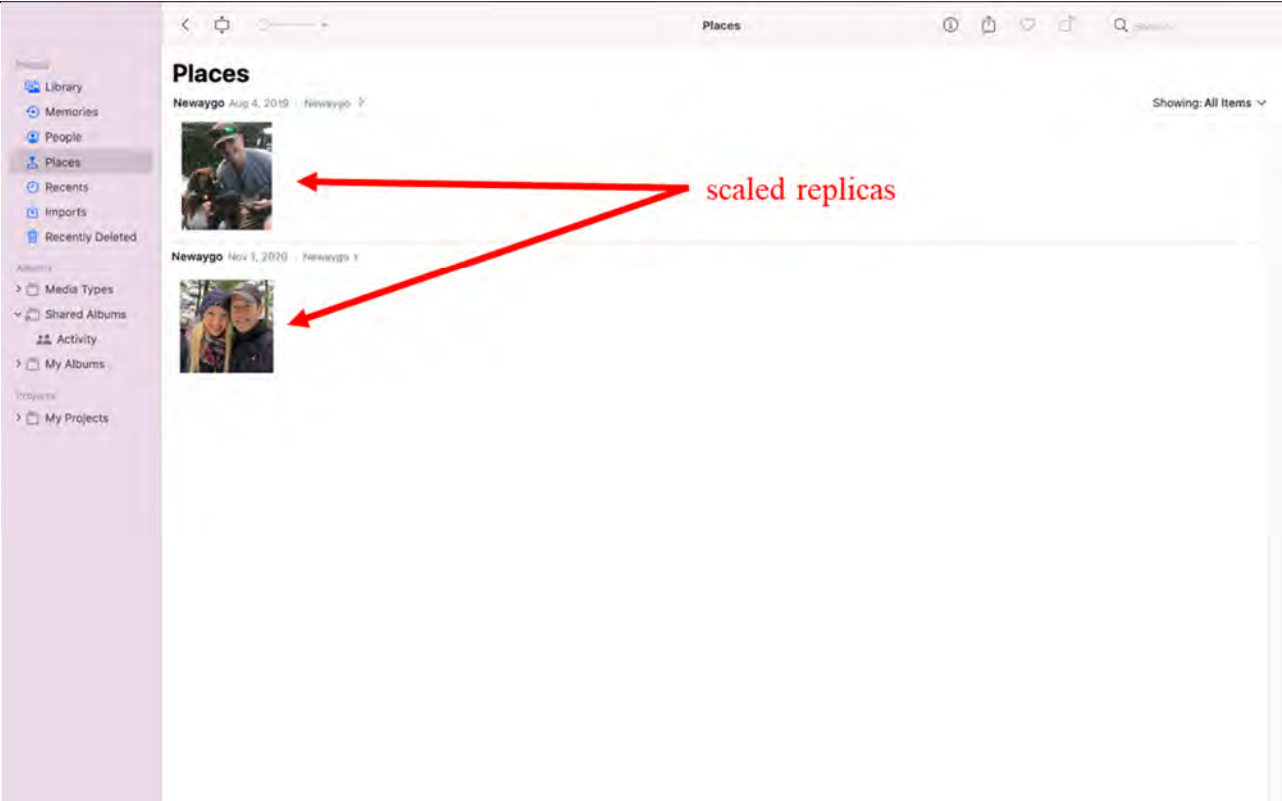
	
<p><b>1[d]</b> responsive to a click or tap of the second user selectable thumbnail image, displaying a second location view on the video display device, the second location view comprising a majority portion of a third screenshot of the video display device, the</p>	<p>Responsive to a click or tap of 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>

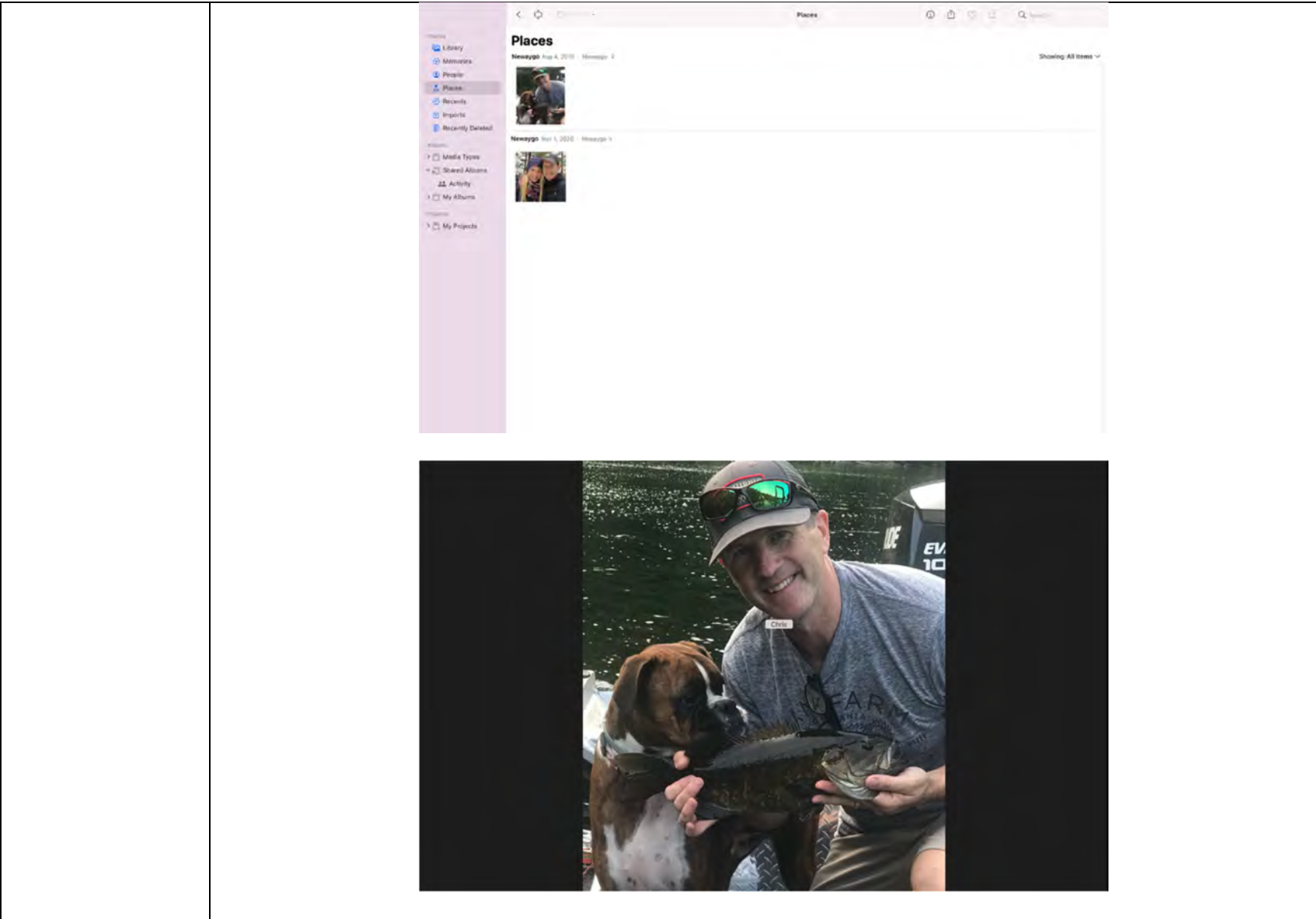


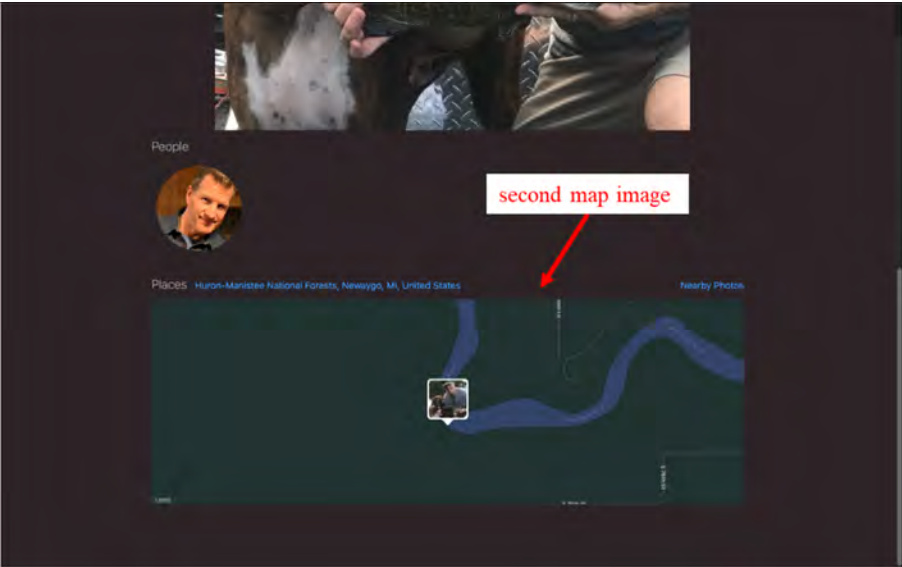
	
<p><b>1[d][iii]</b> (ii) a scaled replica of each of the digital photographs or images or videos in the second set of digital files, and</p>	<p>macOS displays a scaled replica of each of the digital photographs or images or videos in the second set of digital files.</p>

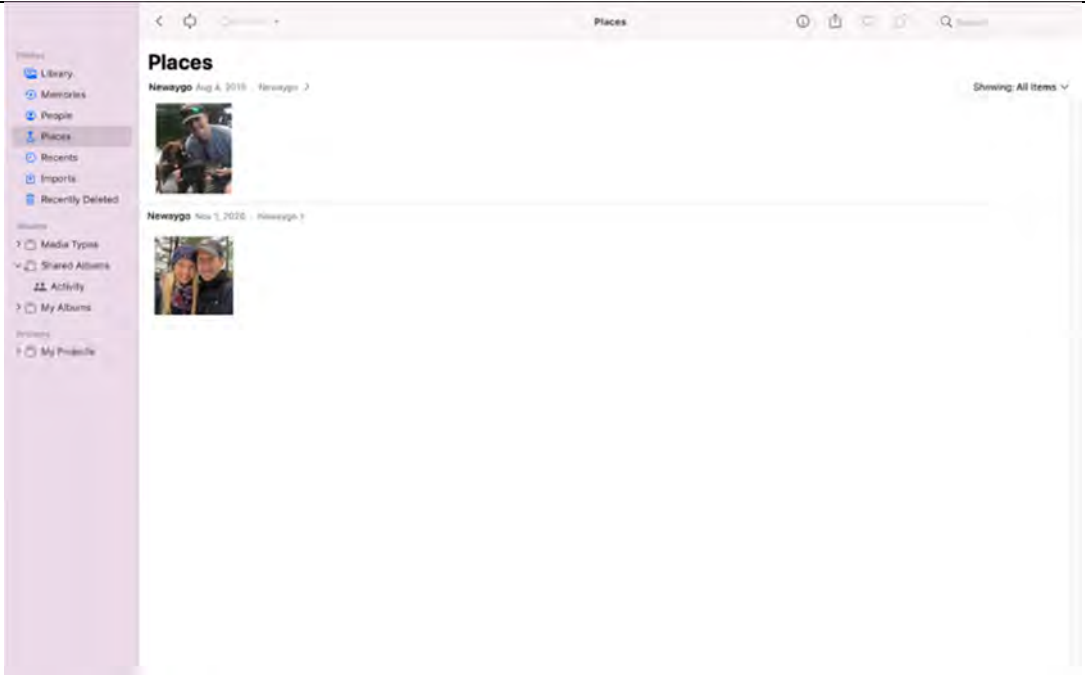
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS

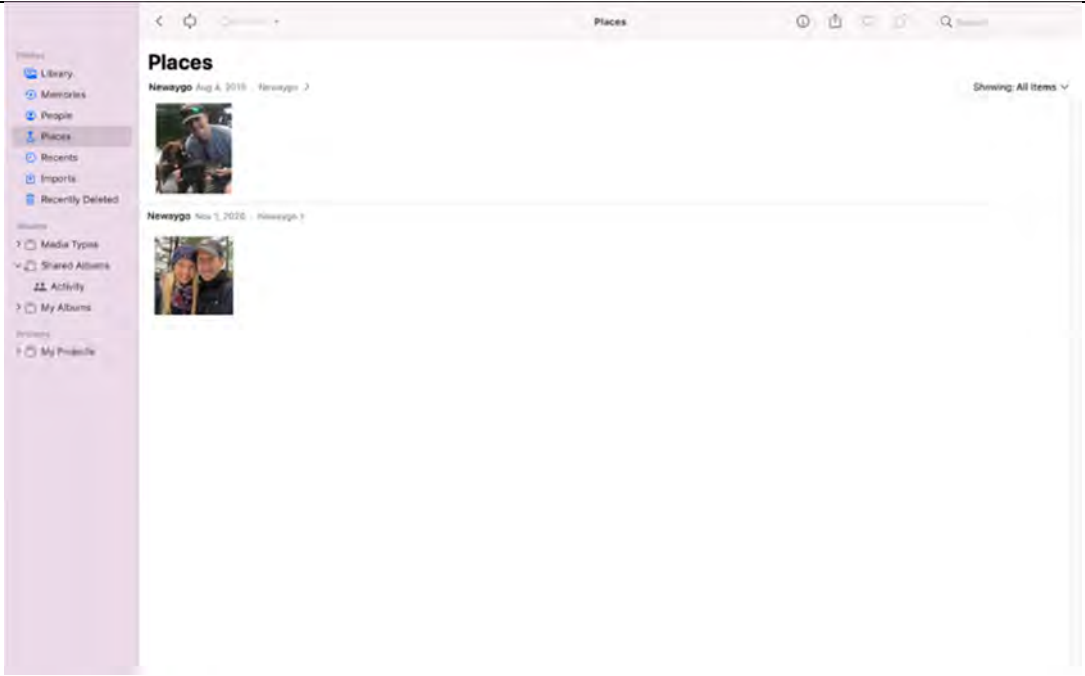
	 <p>The screenshot shows the 'Places' view in the macOS Photos app. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, and Recently Deleted. Below these are 'Albums' (Media Types, Shared Albums, Activity, My Albums) and 'Projects' (My Projects). The main area displays two geotagged photos from 'Newygo'. The first photo is dated 'Aug 4, 2019' and the second is '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>

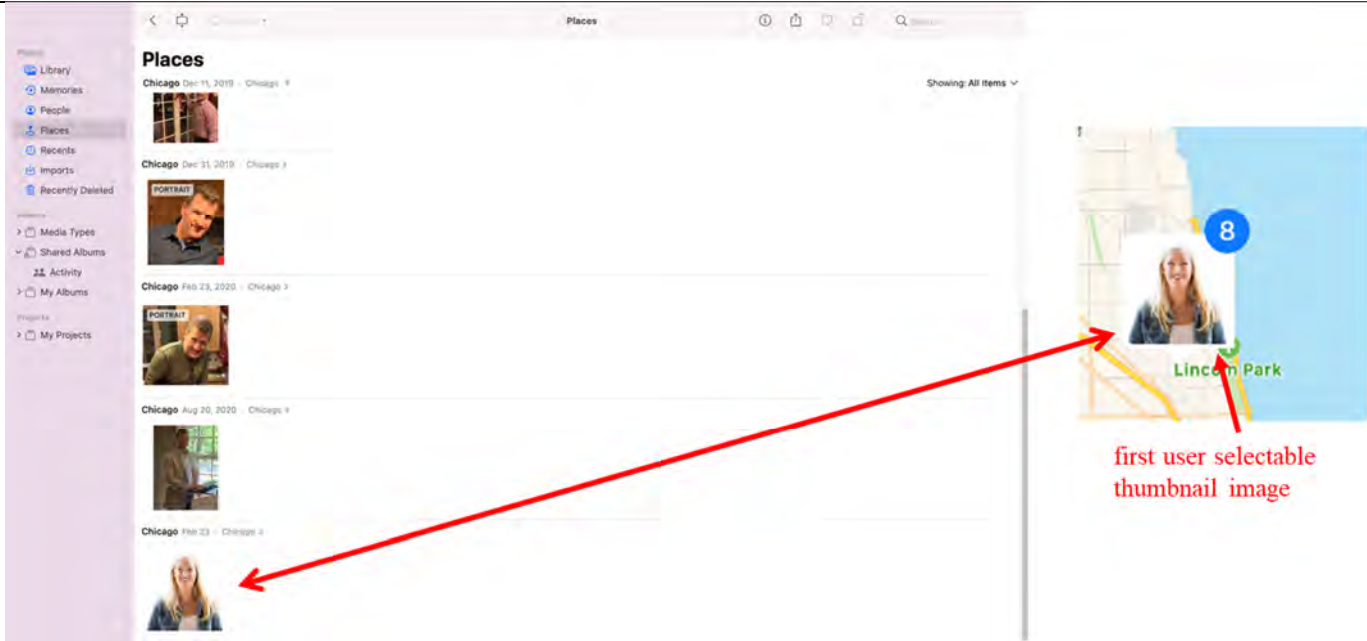
Initial Infringement Contentions – U.S. Patent No. 9,552,376 – Apple macOS



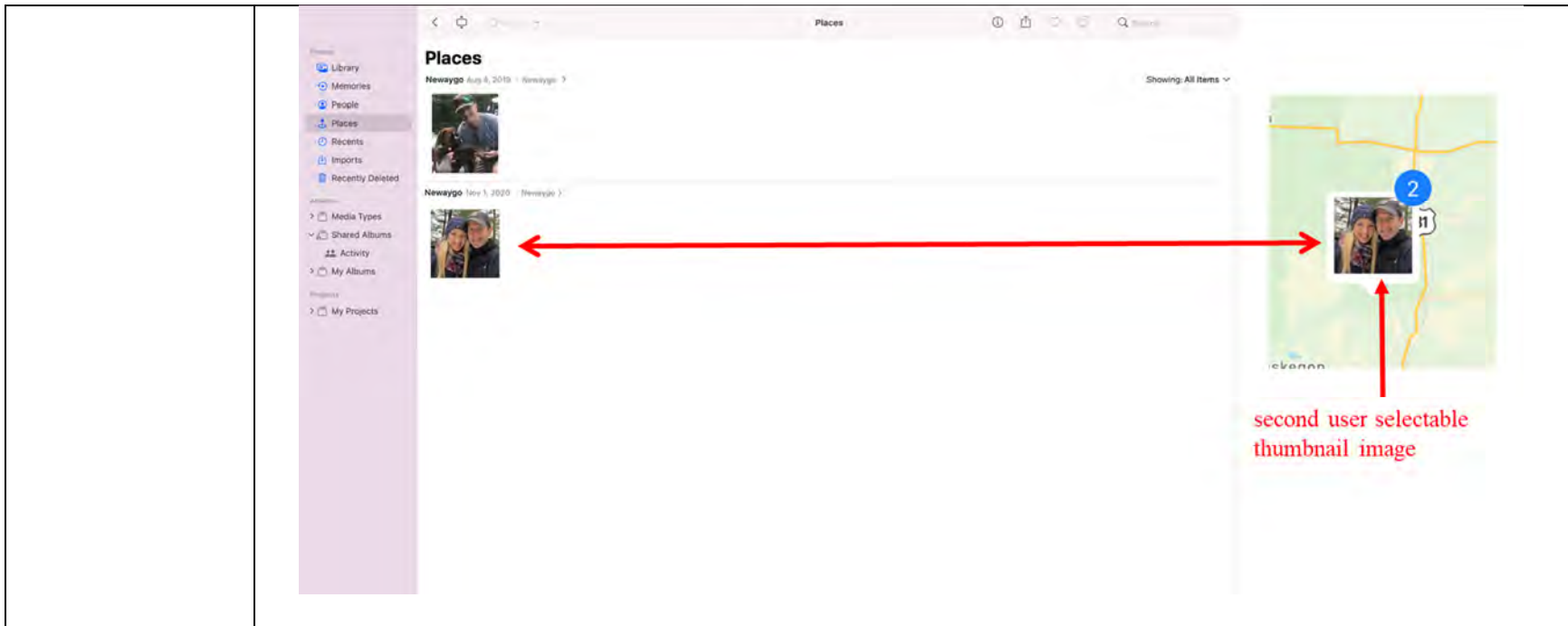
	 A screenshot of a macOS interface, likely a photo gallery or map application. At the top, there is a large photograph of a dog. Below it, a 'People' section shows a circular profile picture of a man. Underneath, a 'Places' section displays a map of Huron-Mandaree National Forests in Newaygo, MI, United States. A red arrow points from a white box labeled 'second map image' to a small, scaled replica of the dog photo overlaid on the map. The background of the interface is dark.
<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>first user selectable thumbnail image</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**

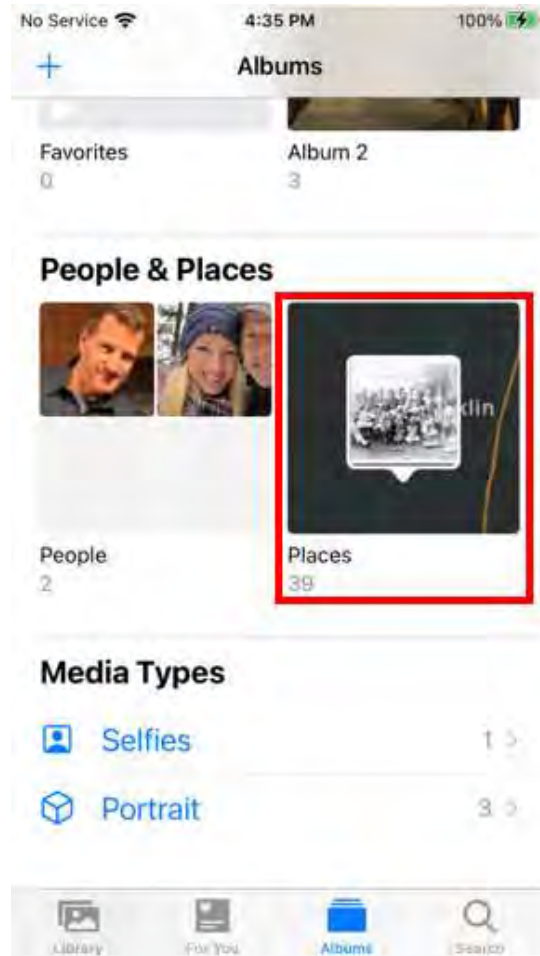
**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

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).

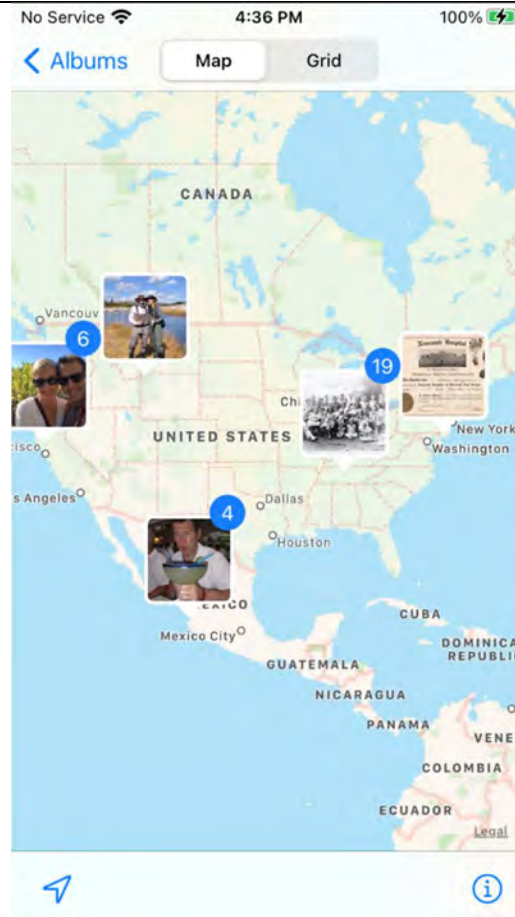


location selectable element

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

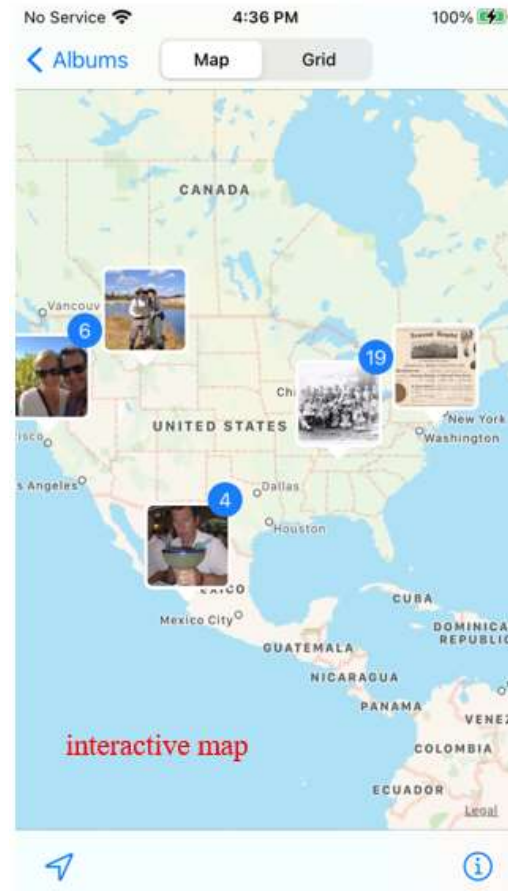
Responsive to a click or tap of the location selectable element, iOS displays a map view on a video display device (e.g., the Apple iPhone).

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



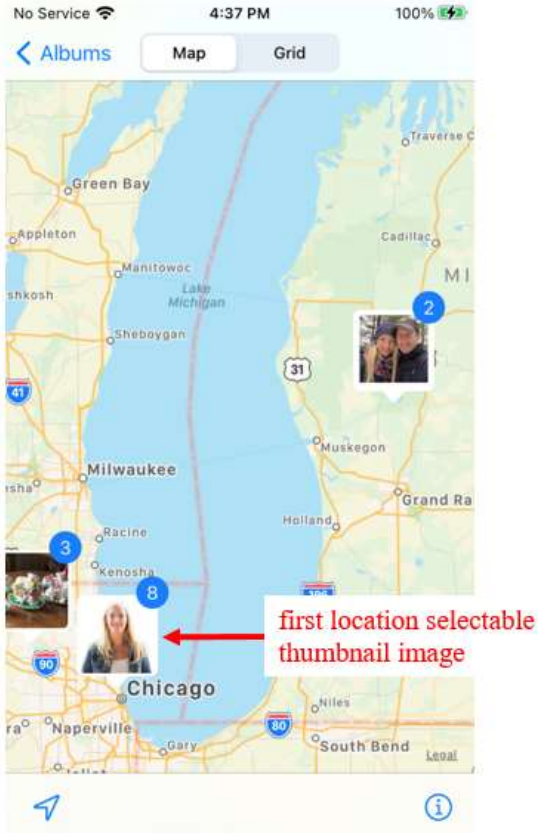
**1[b][i]** (i) a representation of an interactive map;

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

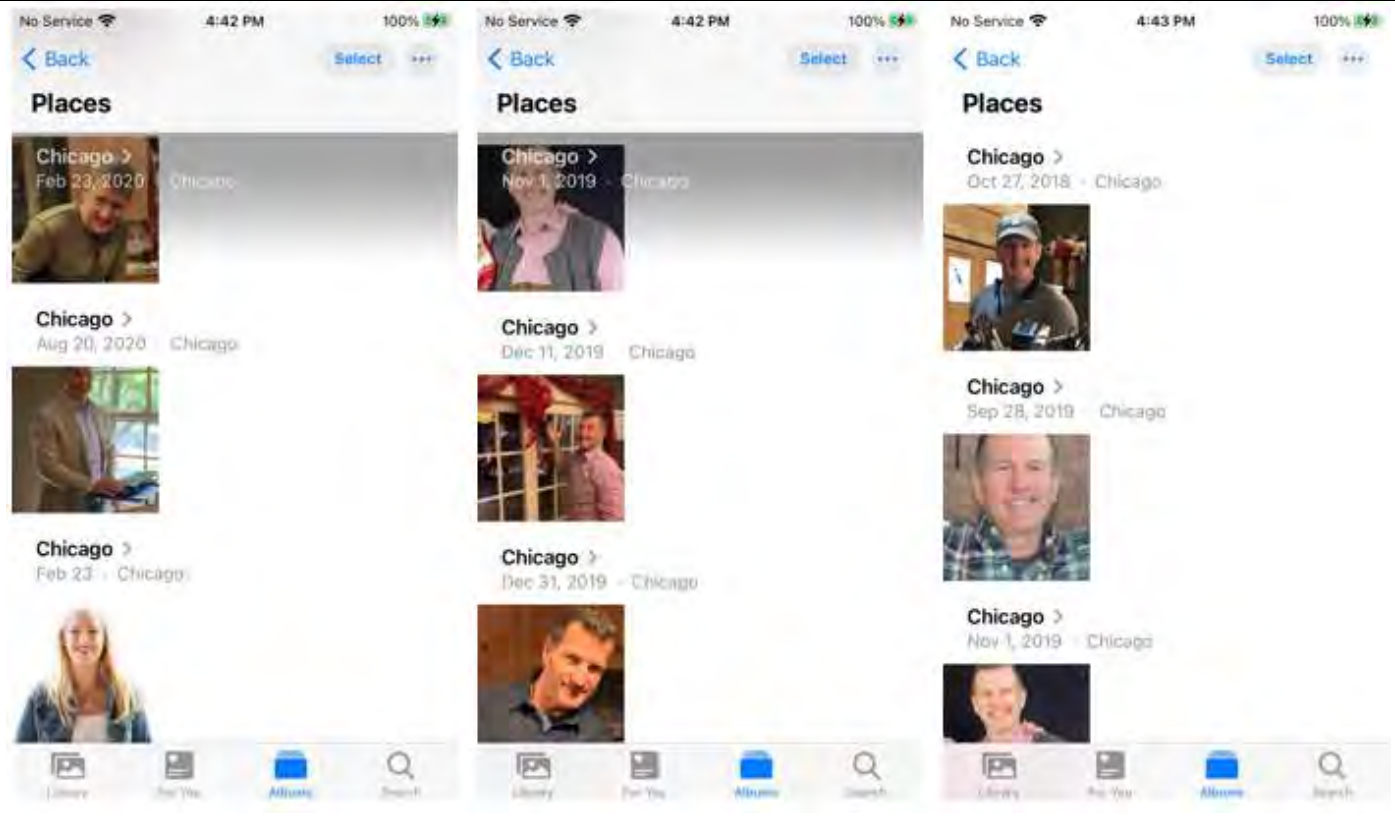


The map is interactive at least because a user can zoom in or out to see different locations, as shown below.

<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;

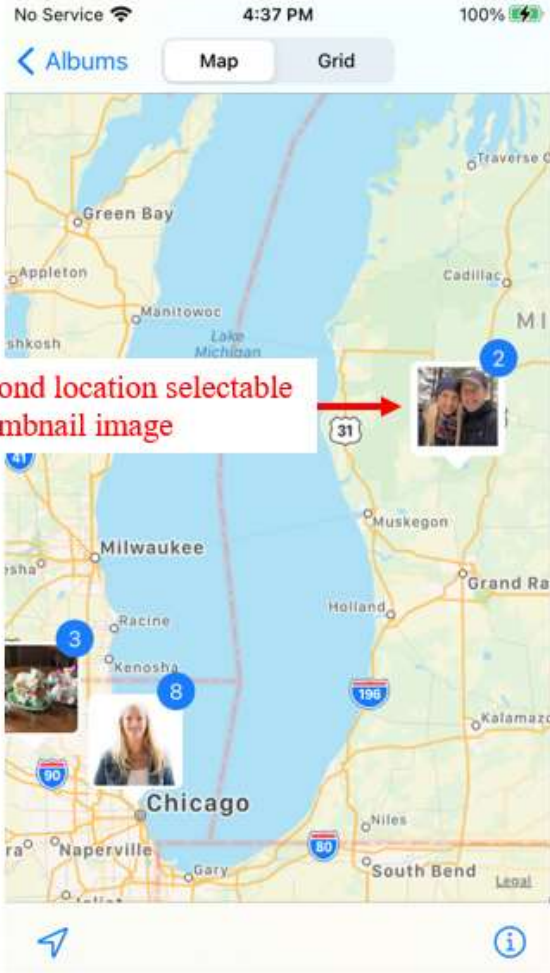


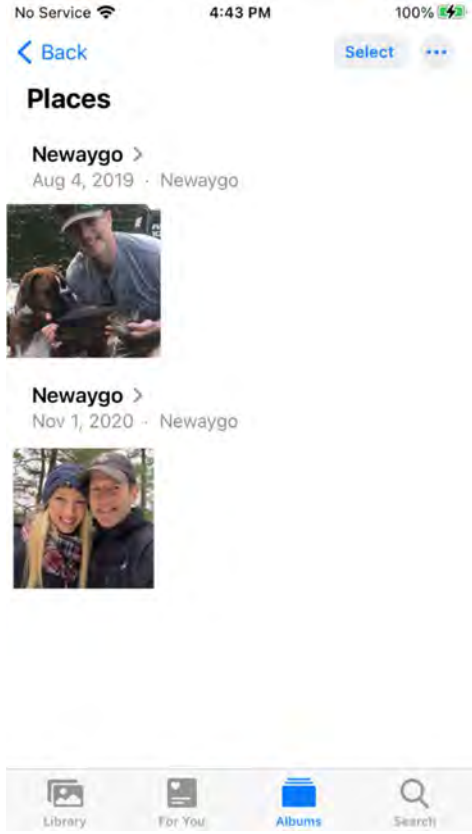
**1[b][iii]** (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number that

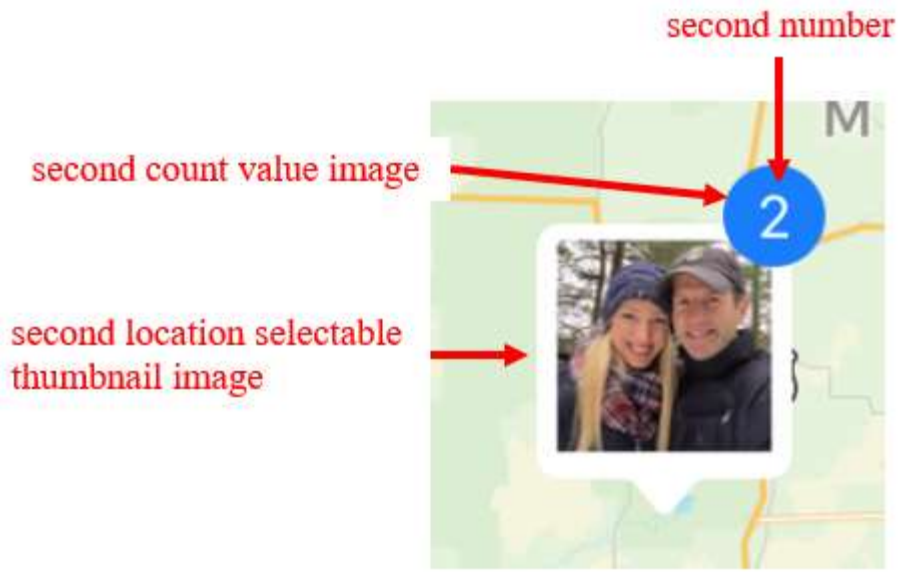
Displaying the map view includes displaying a first count value image partially overlapping the first location selectable thumbnail image. The first count value image including a first number (in this example, 8), which corresponds to the number of digital photographs and videos in the first set of photographs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



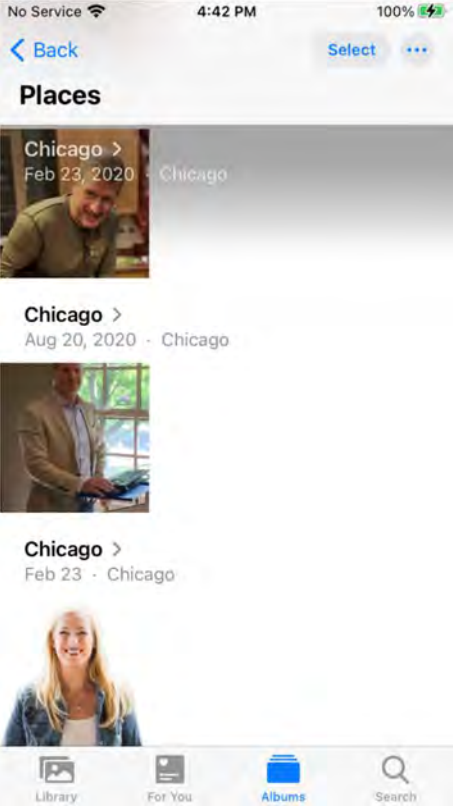
<p>corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;</p>	
<p><b>1[b][iv]</b> (iv) a second location selectable thumbnail image at a second location on the interactive map, the second location being associated with the geographic coordinates 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>


	 <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 locations: 'Newaygo &gt;' with a date of 'Aug 4, 2019' and a thumbnail of a man with a dog, and another 'Newaygo &gt;' with a date of 'Nov 1, 2020' and a thumbnail 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>

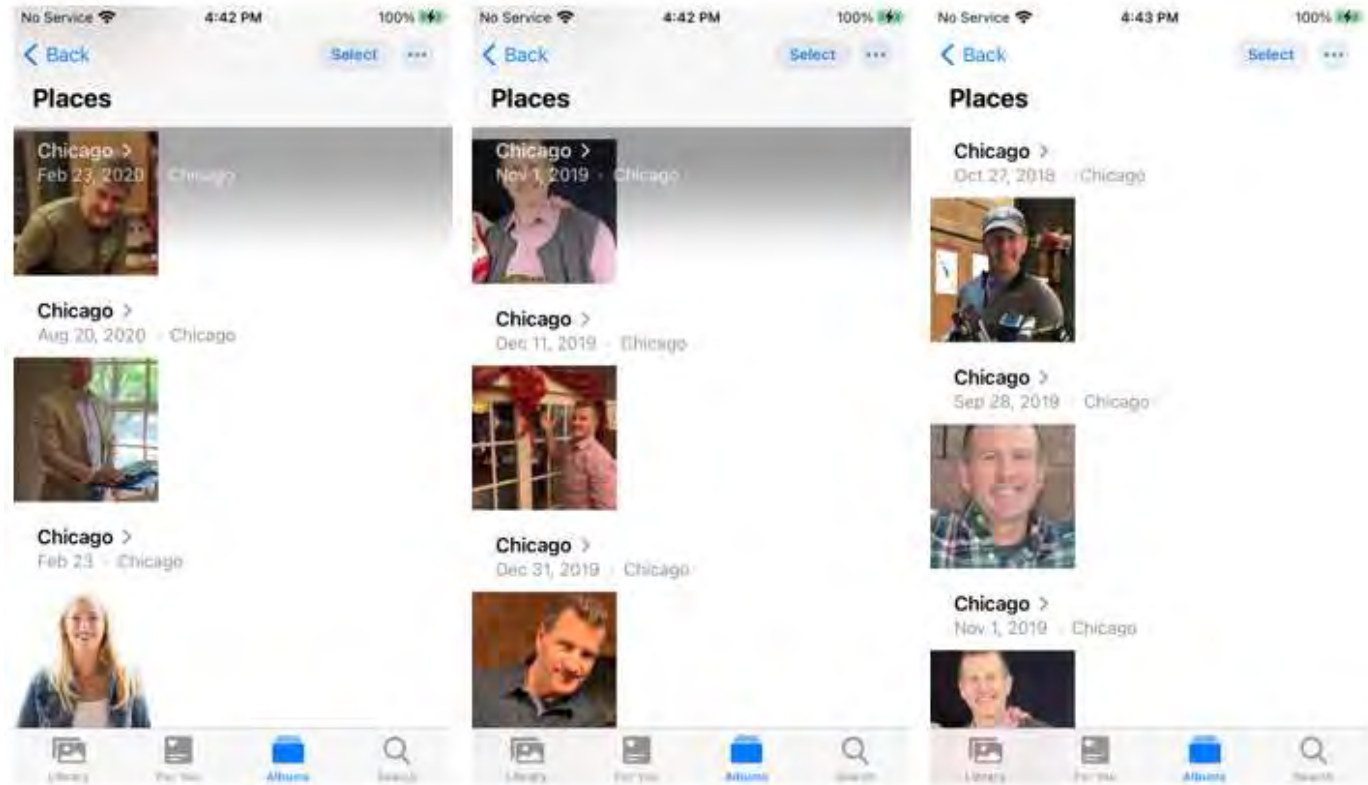
<p>number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;</p>	 <p>The diagram shows a map interface. A red arrow labeled "second number" points to a blue circular pin containing the number "2". Another red arrow labeled "second count 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>

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	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '4:42 PM', and '100%' battery. Below the status bar are 'Back' and 'Select' buttons. The title 'Places' is centered. Three photo thumbnails are visible, each with a 'Chicago' tag and a date: 'Chicago &gt; Feb 23, 2020 - Chicago', 'Chicago &gt; Aug 20, 2020 - Chicago', and 'Chicago &gt; Feb 23 - Chicago'. The bottom dock shows 'Library', 'For You', 'Albums', and 'Search' icons.</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 displays a list of photos grouped by location. The first location is 'Chicago', with a date of 'Feb 23, 2020'. Below it is another 'Chicago' location with a date of 'Aug 20, 2020'. A red arrow points to the 'Chicago' text of the second location, with the label 'first location name' next to it. The bottom of the screen shows the standard iOS Photos app navigation bar with icons for Library, For You, Albums, and Search.</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>

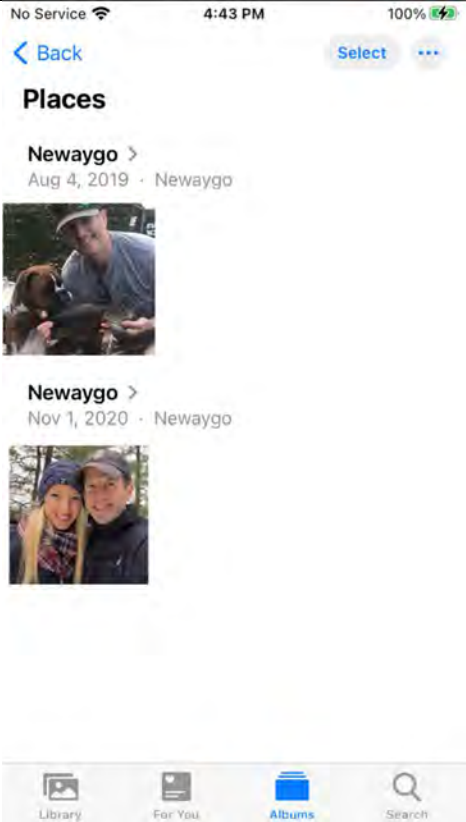
videos in the first set of digital photographs and videos not being overlaid on the interactive map; and




*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].

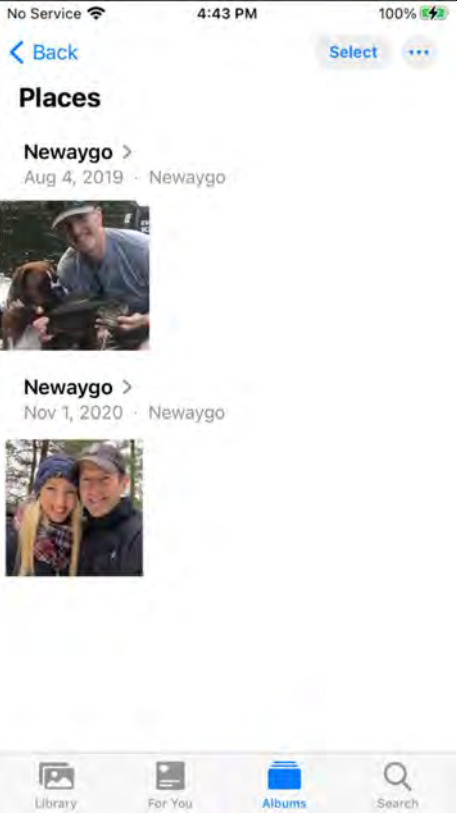
**1[d]** responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video

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>

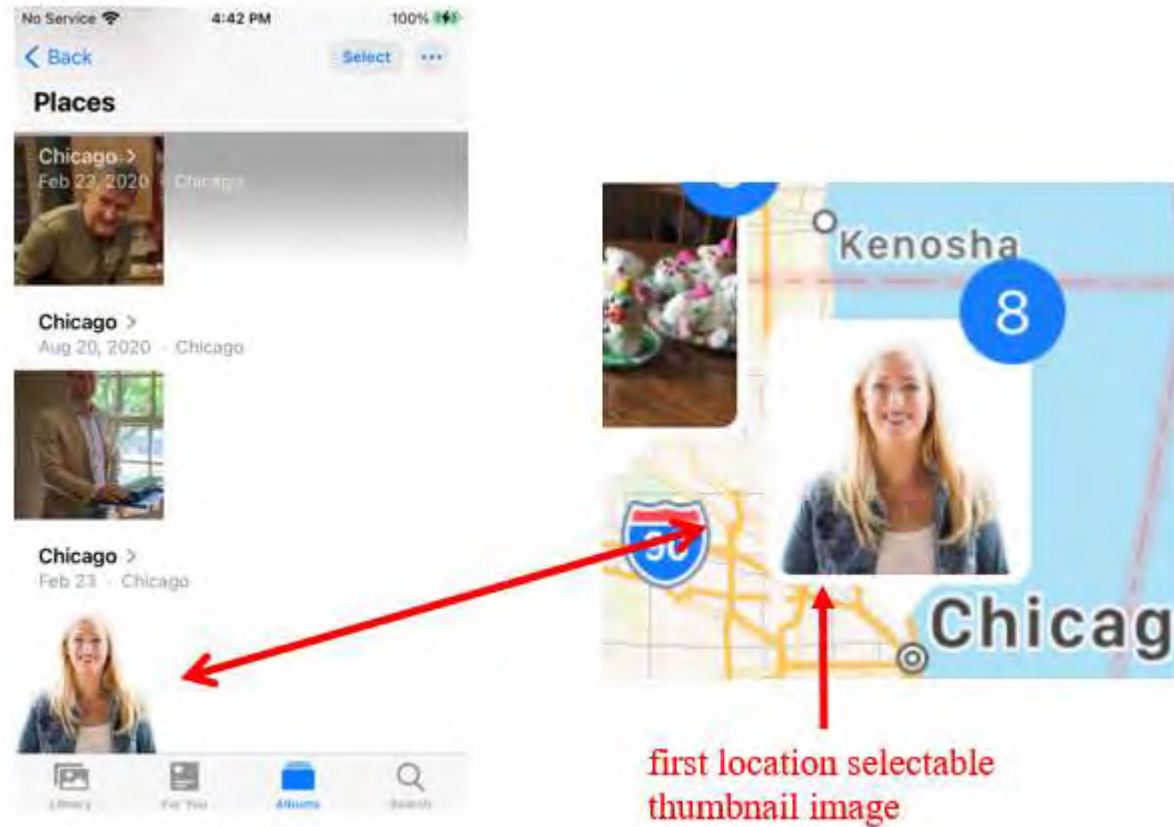


	 <p>The screenshot shows the 'Places' section of the Photos app. It lists two locations, both named 'Newaygo'. The first location is dated 'Aug 4, 2019' and features a photo of a man with a dog. The second location is dated 'Nov 1, 2020' and features a photo of a man and a woman. Red boxes highlight the 'Newaygo' text in both entries. A red arrow points to the 'Newaygo' text in the second entry, with the label 'second location name' next to it. The top of the screen shows 'No Service', '4:43 PM', and '100%' battery. The bottom navigation bar includes '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>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

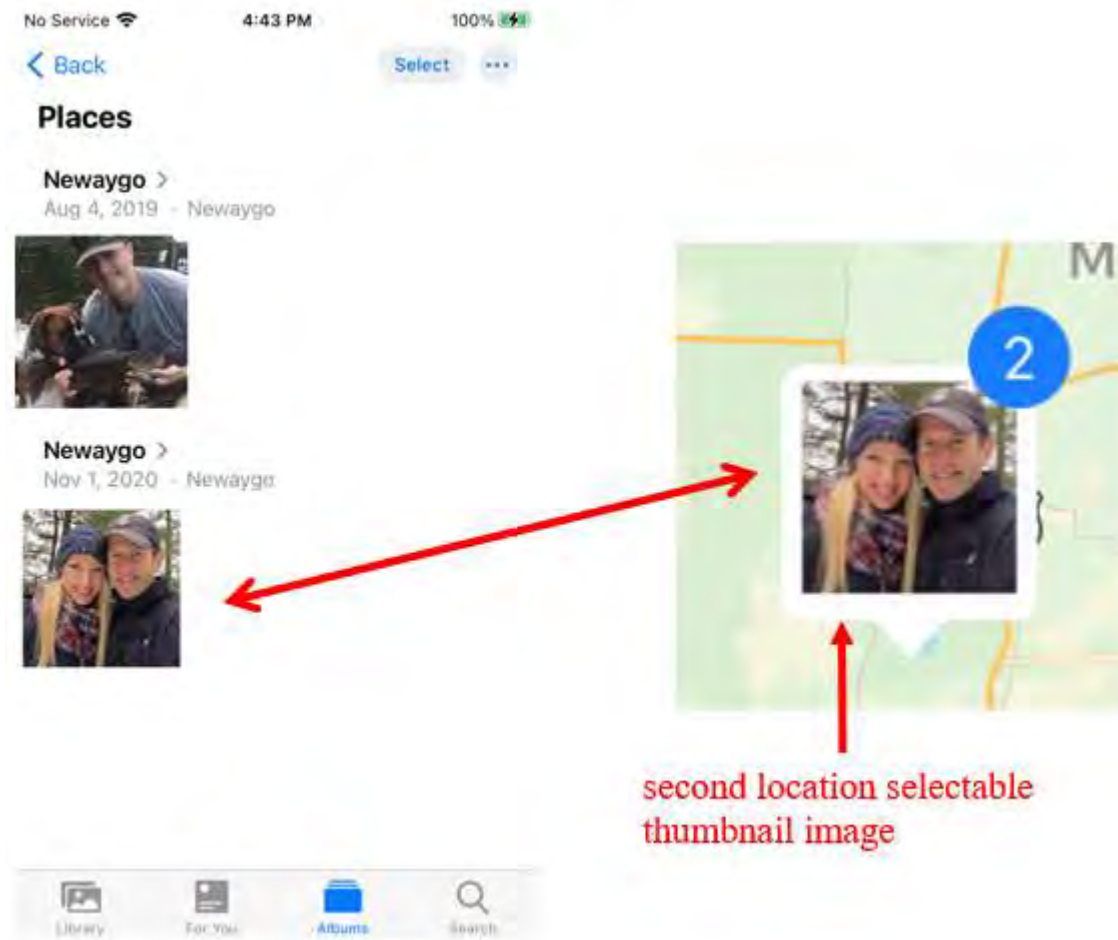
As shown below, the first location selectable thumbnail image (*see* limitation 1[b][ii]) includes a scaled representation of at least one of the digital photographs in the first set of digital photographs (*see* limitation 1[b][ii][A]).



**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

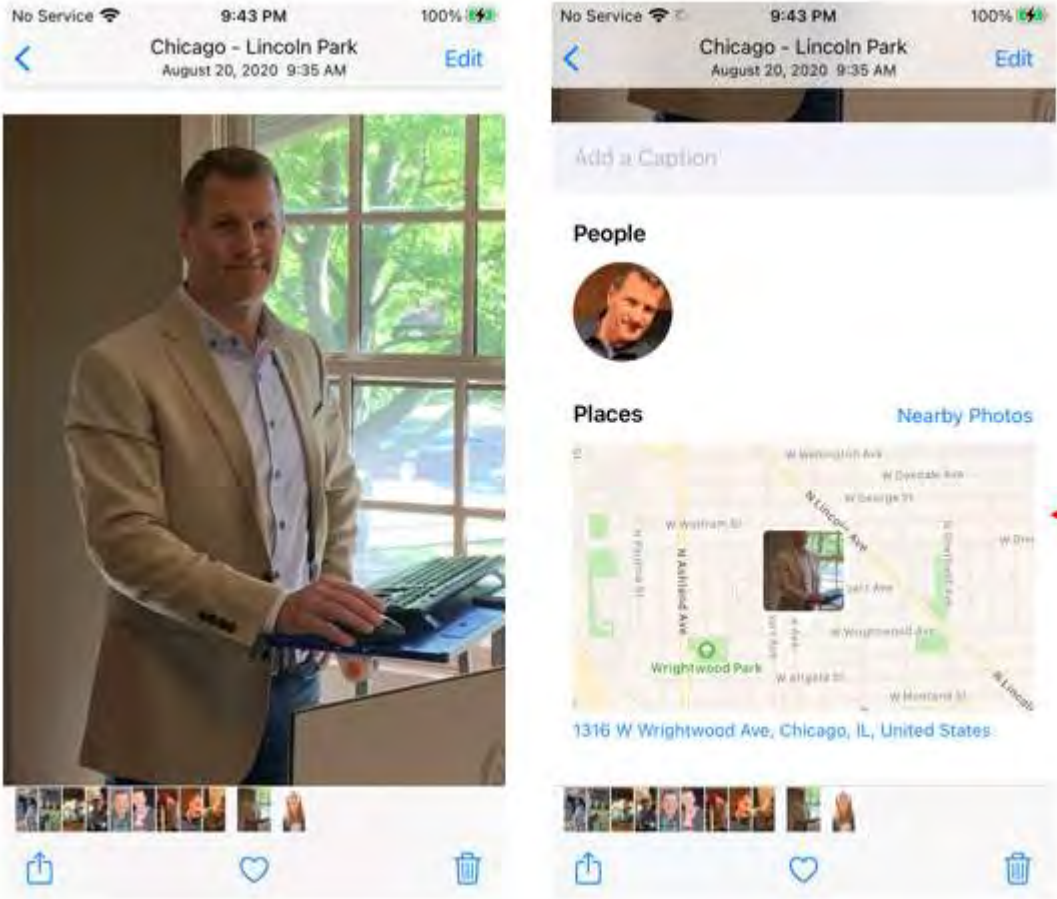
Responsive to a click or tap of one of the scaled replicas in the first location view (*see* limitation 1[c][ii]), iOS displays a first digital photograph associated with the first scaled replica.


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.

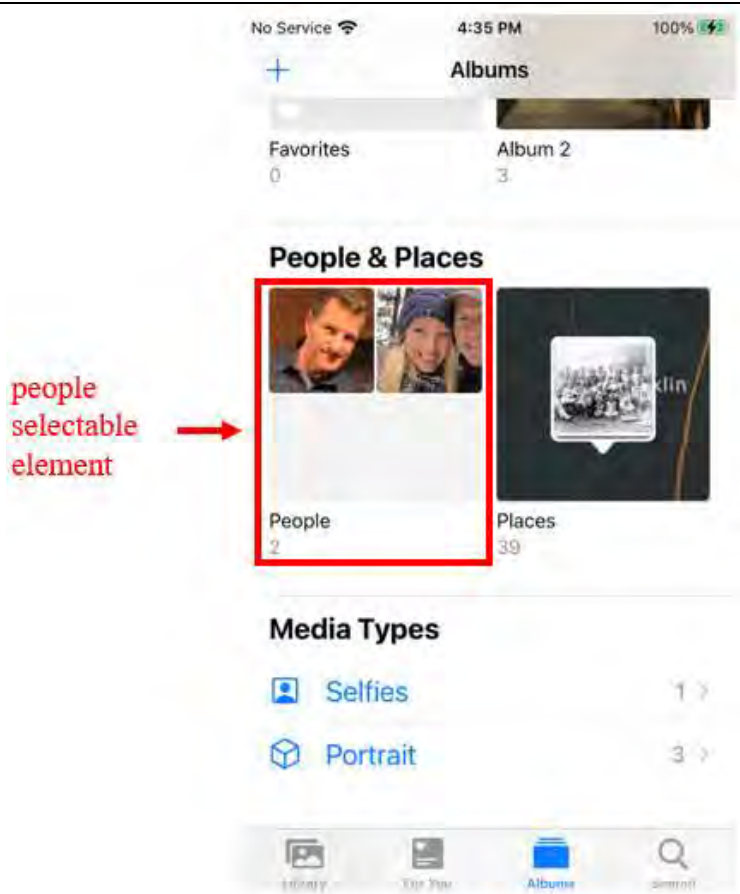
iOS also displays a first map image indicating the geographic coordinates of the first geotag below the first digital photograph, as shown below:

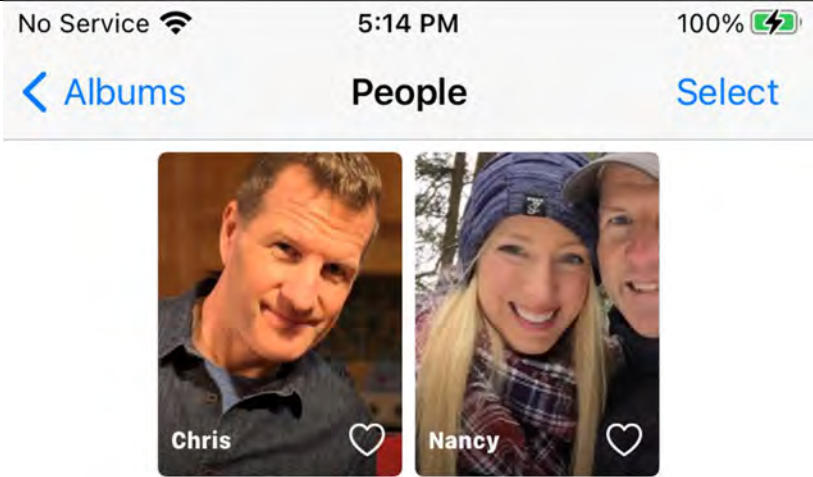
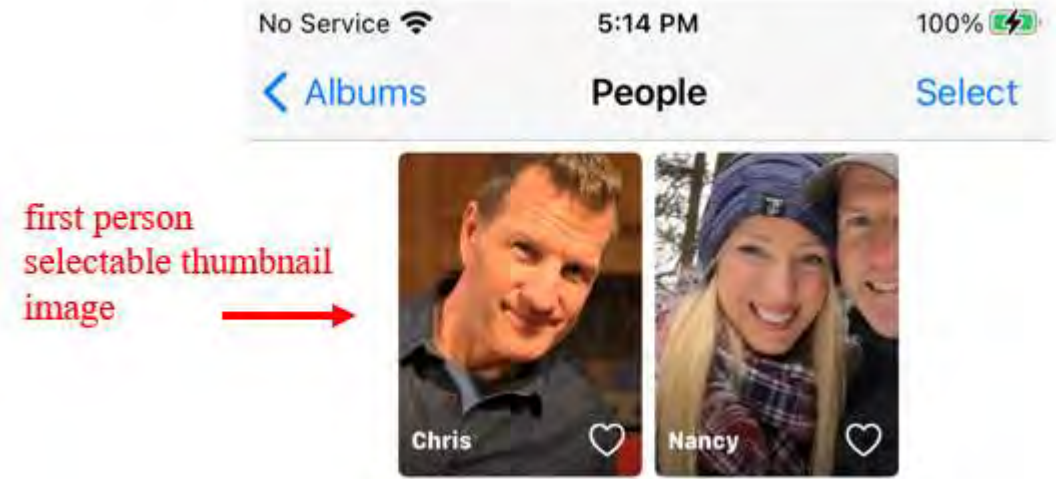
	 <p>The image shows two side-by-side screenshots of an iPhone photo gallery. Both screenshots show a photo of a man in a tan blazer standing by a window. The left screenshot shows the full-size photo. The right screenshot shows the same photo with a map overlay. A red arrow points to the map overlay with the text "first map image".</p>
<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>

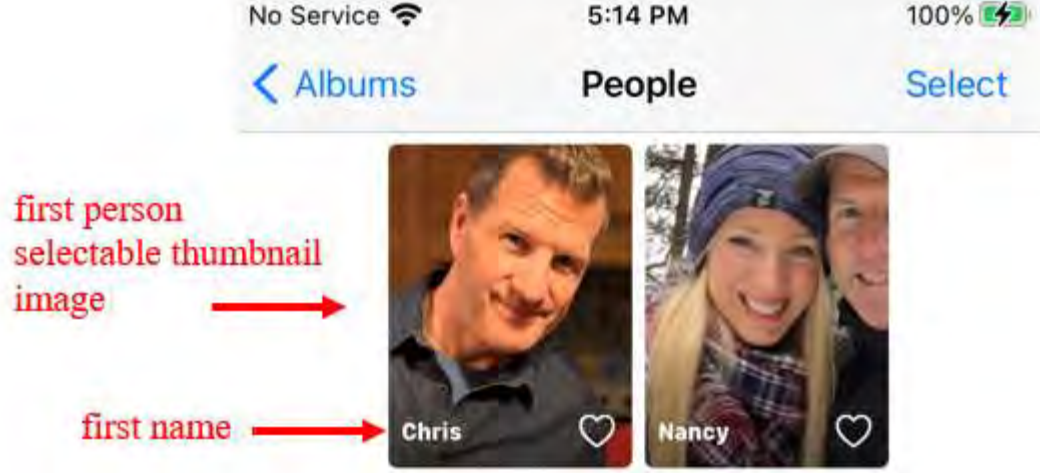
	
<p><b>5[pre]</b> The computer-implemented method of claim 1,</p>	<p>See information for claim 1.</p>
<p><b>5[a]</b> wherein the plurality of selectable</p>	<p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) includes a people selectable element (labeled “People”),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



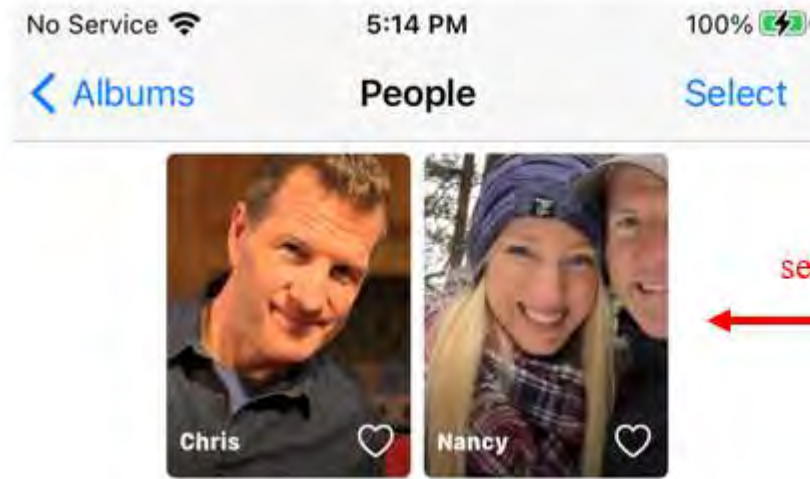
<p>elements further includes a people selectable element,</p>	
<p><b>5[b]</b> the method further comprising responsive to a click or tap of the people selectable element, displaying a people view, the displaying the</p>	<p>iOS displays a people view responsive to a tap of the people selectable element.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

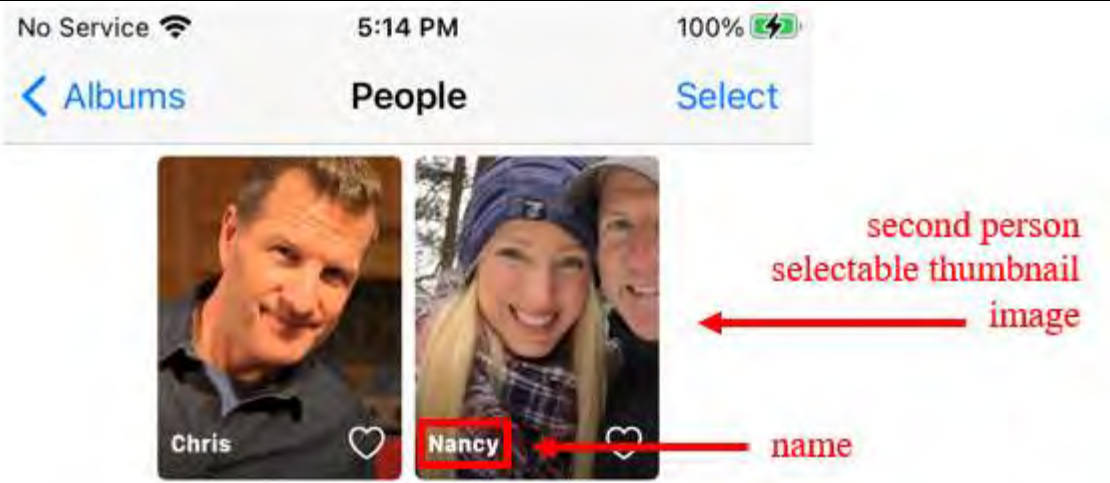
	 <p>The screenshot shows the 'People' view in an iOS photo gallery. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are visible. The first thumbnail is of a man with a mustache, and the name 'Chris' is displayed below it. The second thumbnail is of a woman with blonde hair, and the name 'Nancy' is displayed 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 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

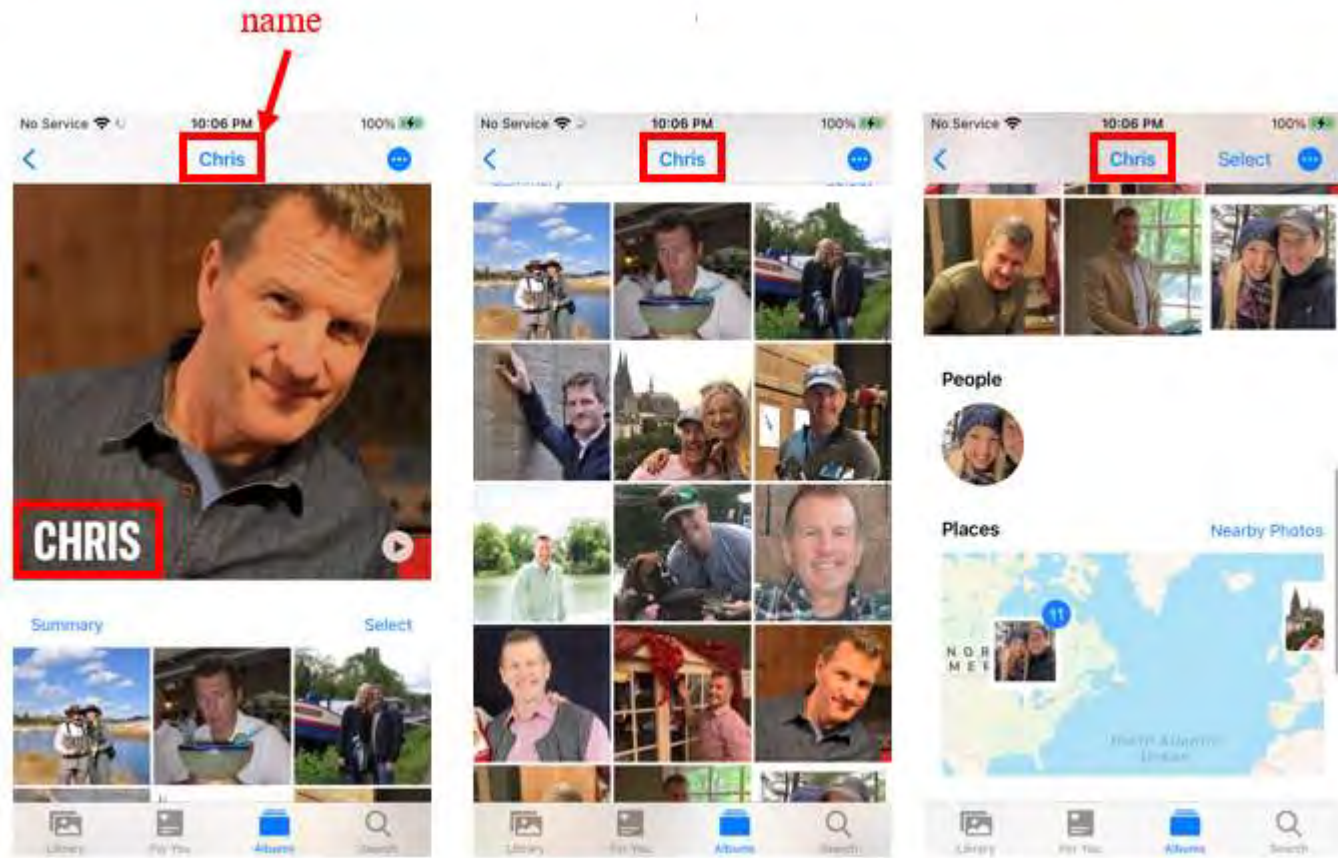


The second person selectable thumbnail image is associated with a fourth set of digital photographs and videos. *See also* information for claim 10.

<p><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 1149 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 1149 1818 1252">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>

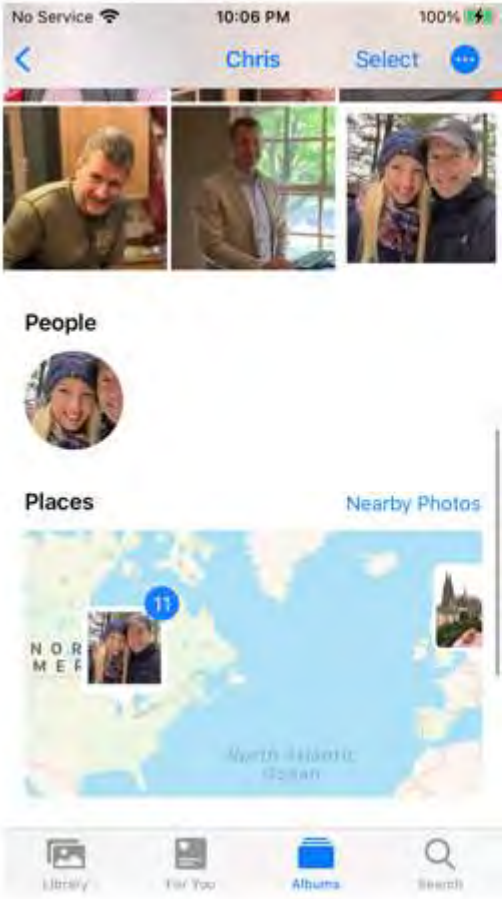
thumbnail image, displaying a first person view, the displaying the first person view including displaying (i) the name associated with the first person and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs.

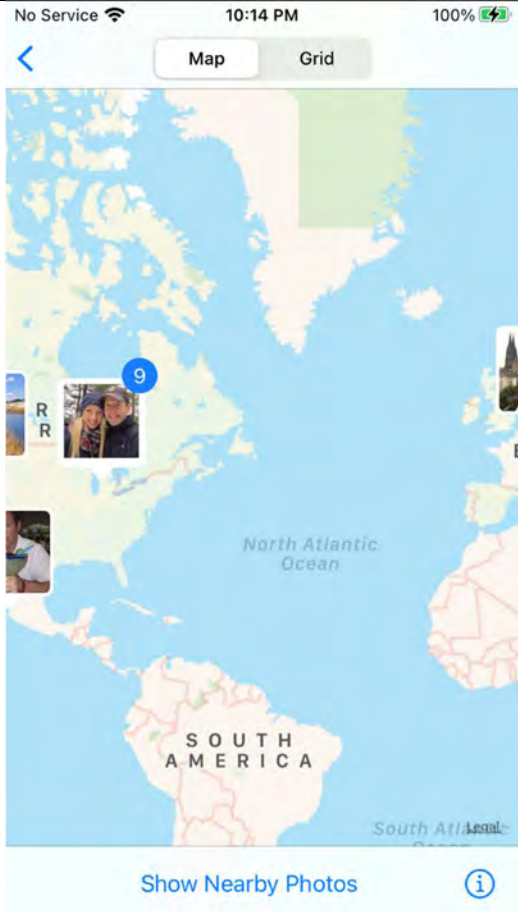


8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a first-

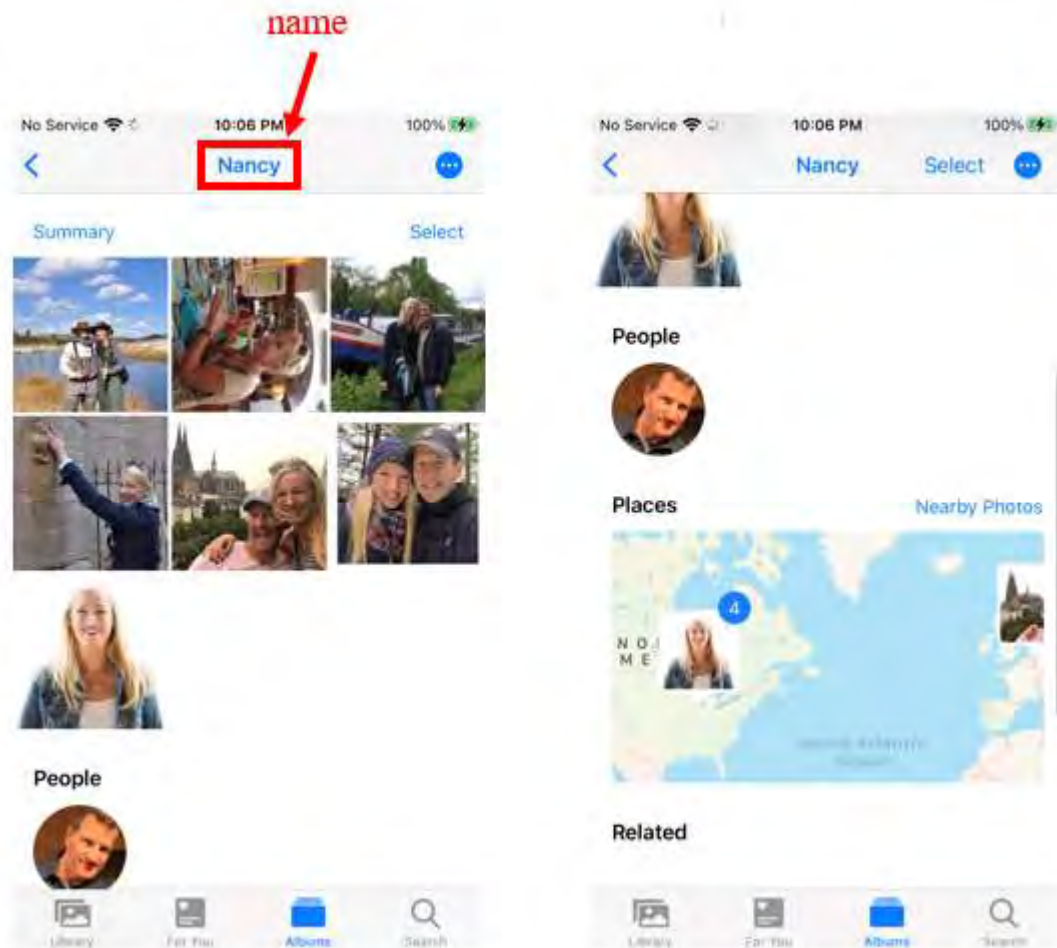
As shown below, the first person view includes a first-person-location selectable element below the scaled replicas.



<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 North America. A red arrow points to a blue pin on the map, which is labeled with the number '11' and has a small photo thumbnail attached to it. To the right of the map, the text 'Nearby Photos' is visible. The bottom of the screen shows the standard iOS navigation bar with icons for Library, For You, Albums, and Search.</p> <p style="color: red; text-align: right;">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-</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>

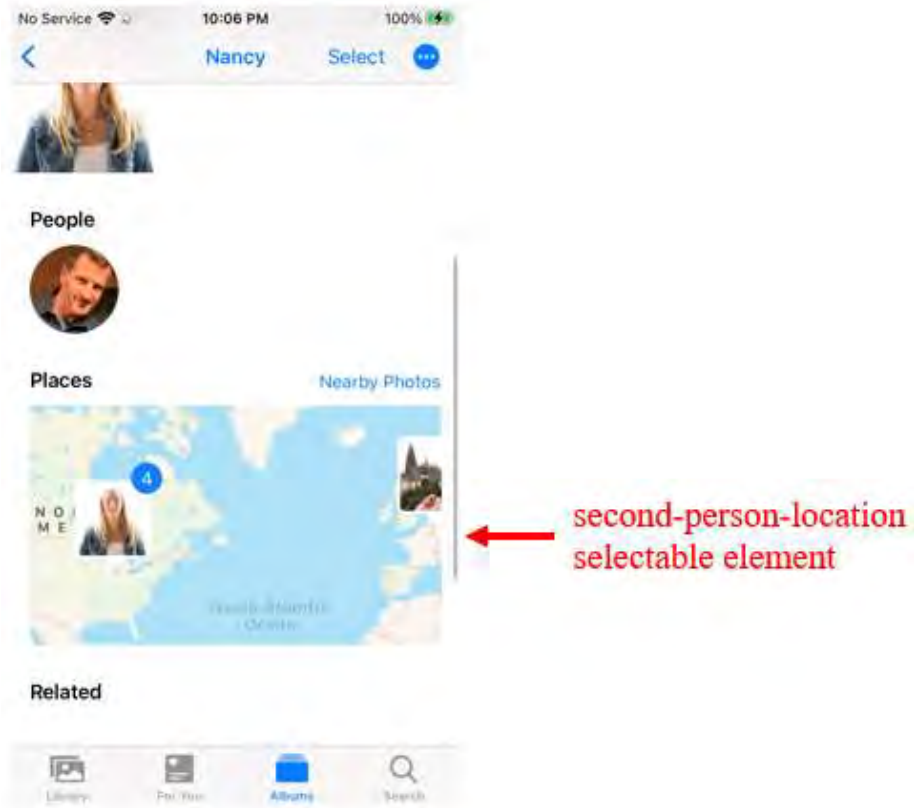
<p>location selectable element, displaying a representation of all locations having a digital photograph or video associated with the first person.</p>	
<p><b>10.</b> The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person selectable</p>	<p>iOS 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>

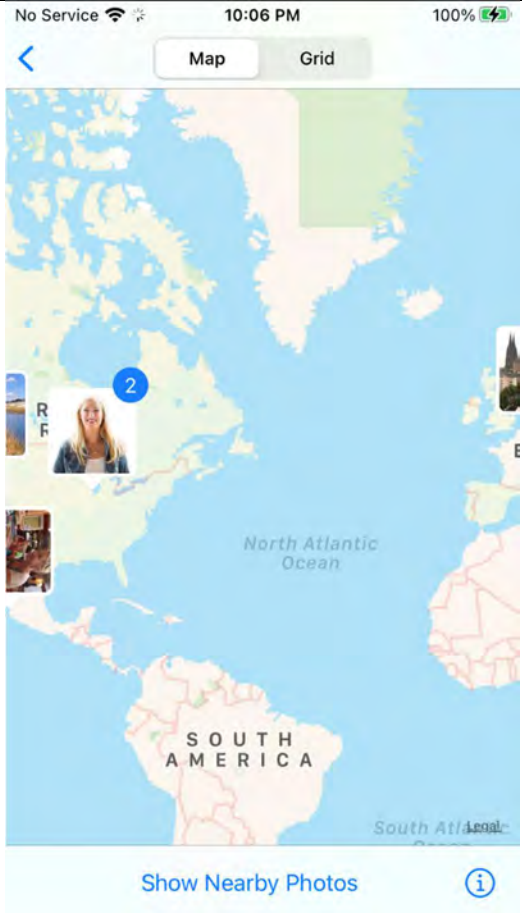
thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.

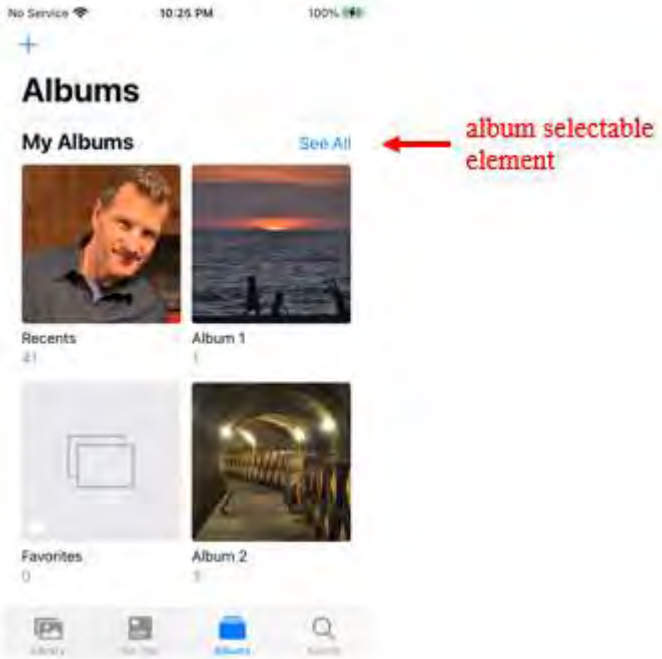


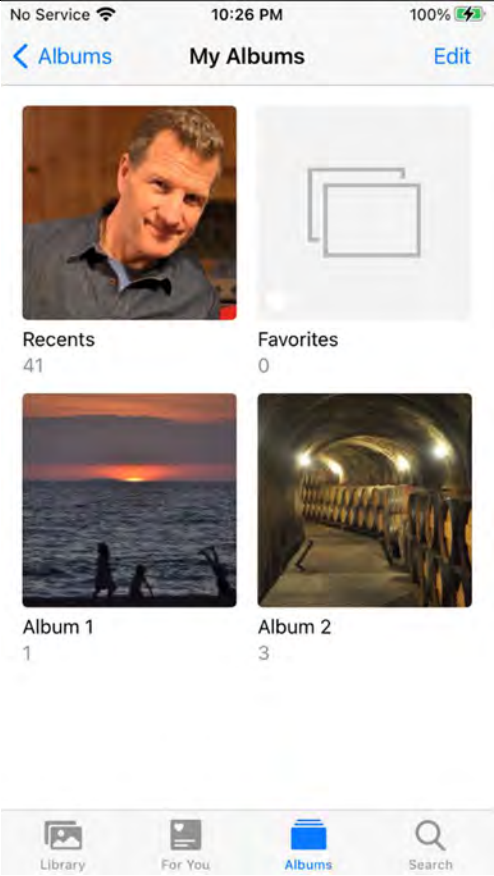
**11.** The computer-implemented method of claim 10, wherein the displaying the second person

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

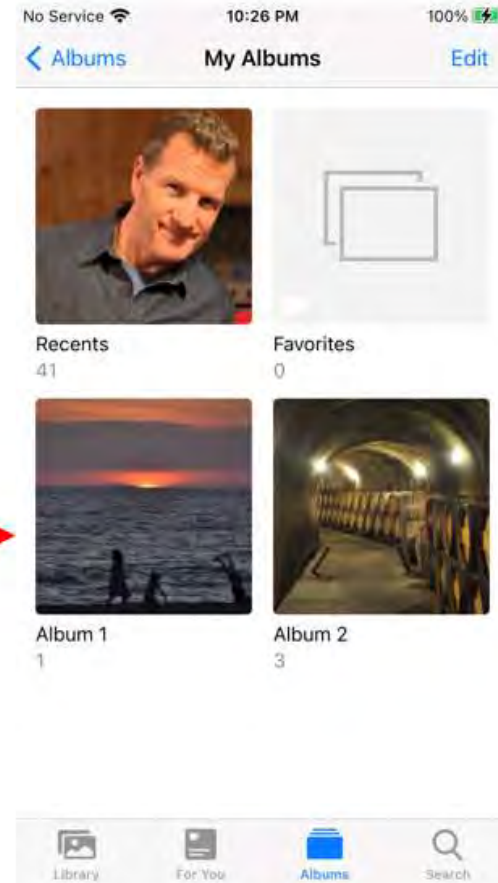
<p>view further includes displaying a second-person-location selectable element.</p>	 <p>The screenshot shows an iOS photo gallery interface. At the top, the status bar displays 'No Service', '10:06 PM', and '100%' battery. Below the status bar, there is a navigation bar with a back arrow, the name 'Nancy', 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, which is labeled 'second-person-location selectable element' in red text.</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;

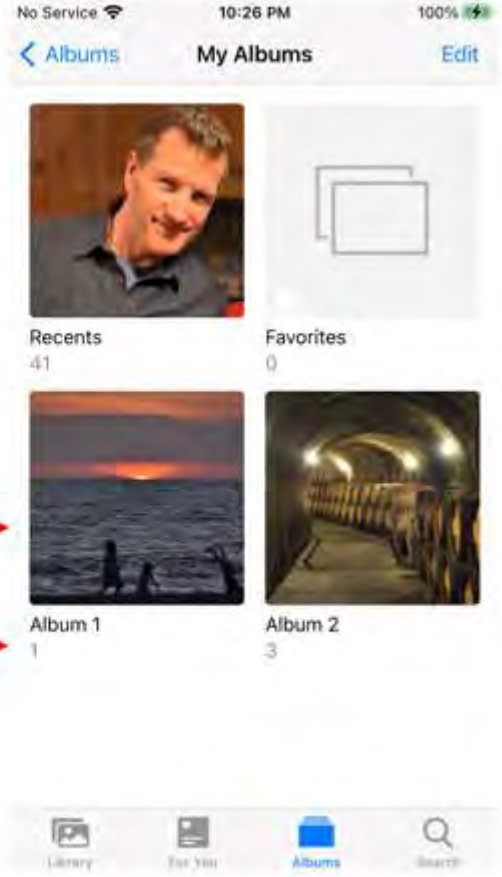


first album selectable element →

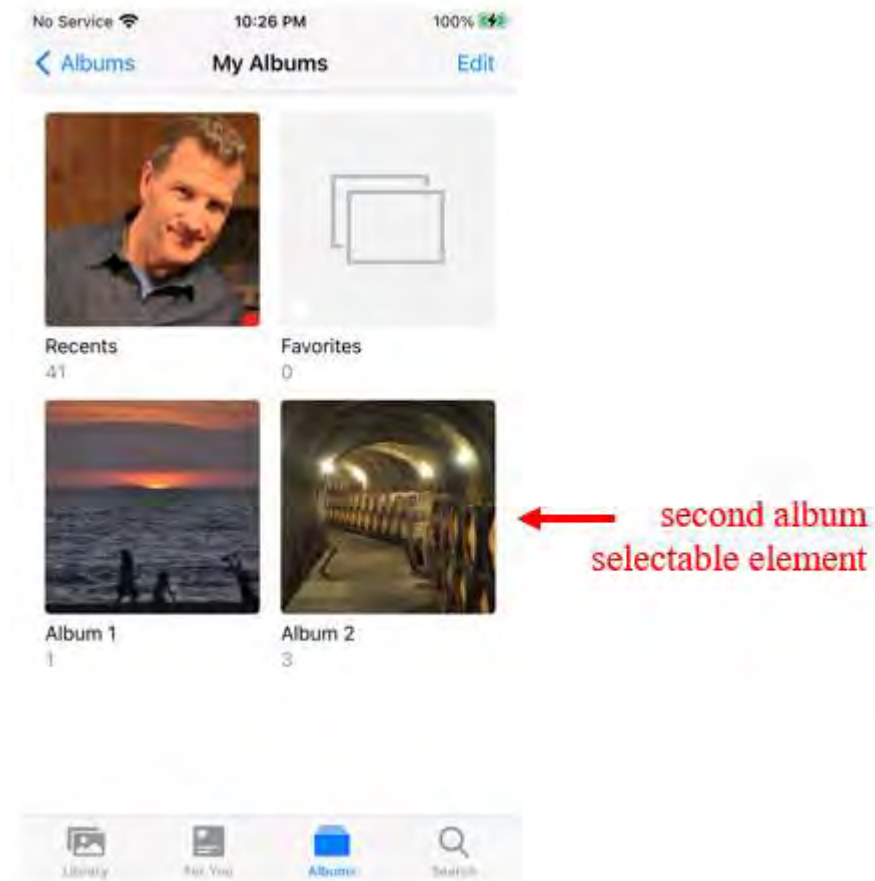
The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.



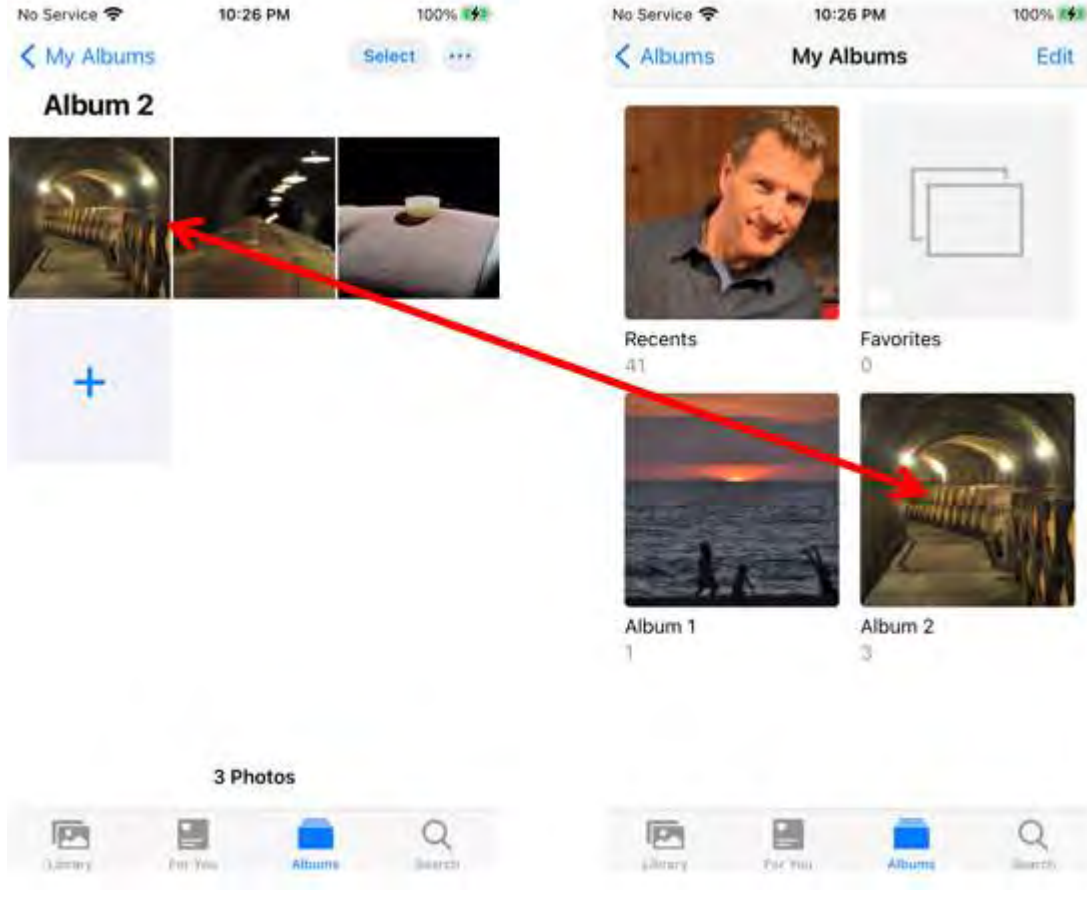
<p><b>13[c][ii]</b> (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;</p>	<p>The album view also includes a first album name associated with the first album, the first album name being displayed adjacent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

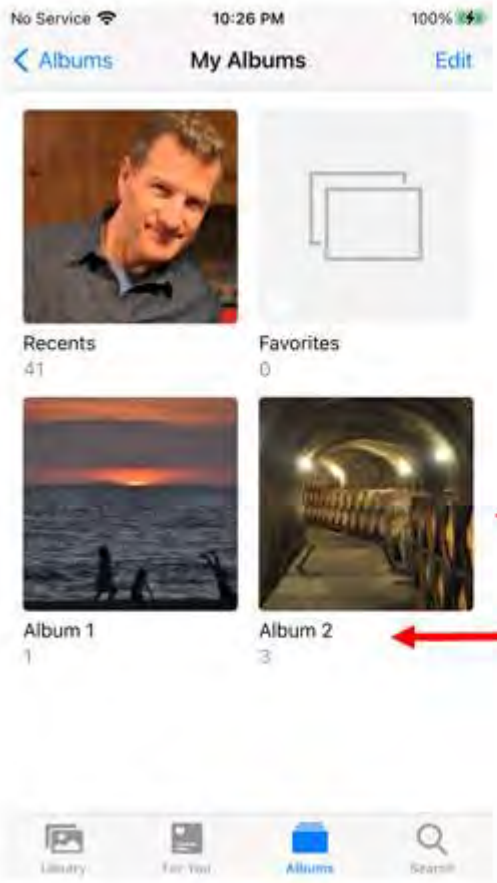
	 <p>first album selectable element →</p> <p>first album name →</p>
<p><b>13[c][iii]</b> (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of</p>	<p>The album view includes a second album selectable thumbnail image.</p>

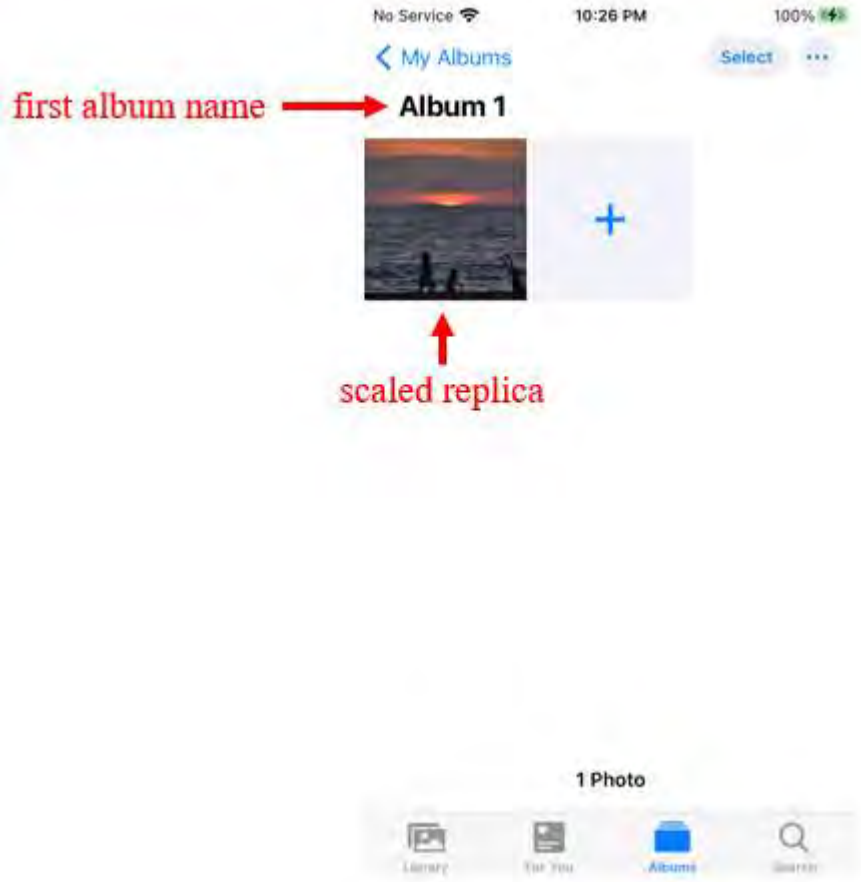
digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag; and



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, there are navigation options: '&lt; Albums', 'My Albums', and 'Edit'. The main area displays four album thumbnails in a 2x2 grid. The top-left thumbnail is 'Recents' with 41 items. The top-right thumbnail is 'Favorites' with 0 items. The bottom-left thumbnail is 'Album 1' with 1 item. The bottom-right thumbnail is 'Album 2' with 3 items. Two red arrows point to the 'Album 2' thumbnail and its name, with 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



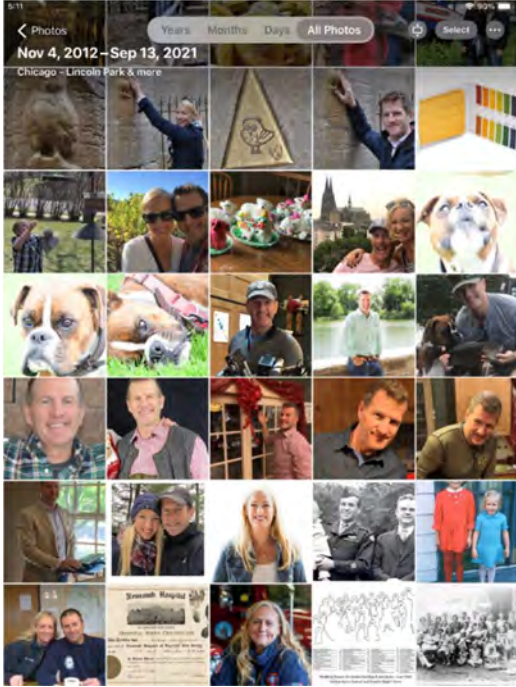
scaled replicas

# **Exhibit B.2**



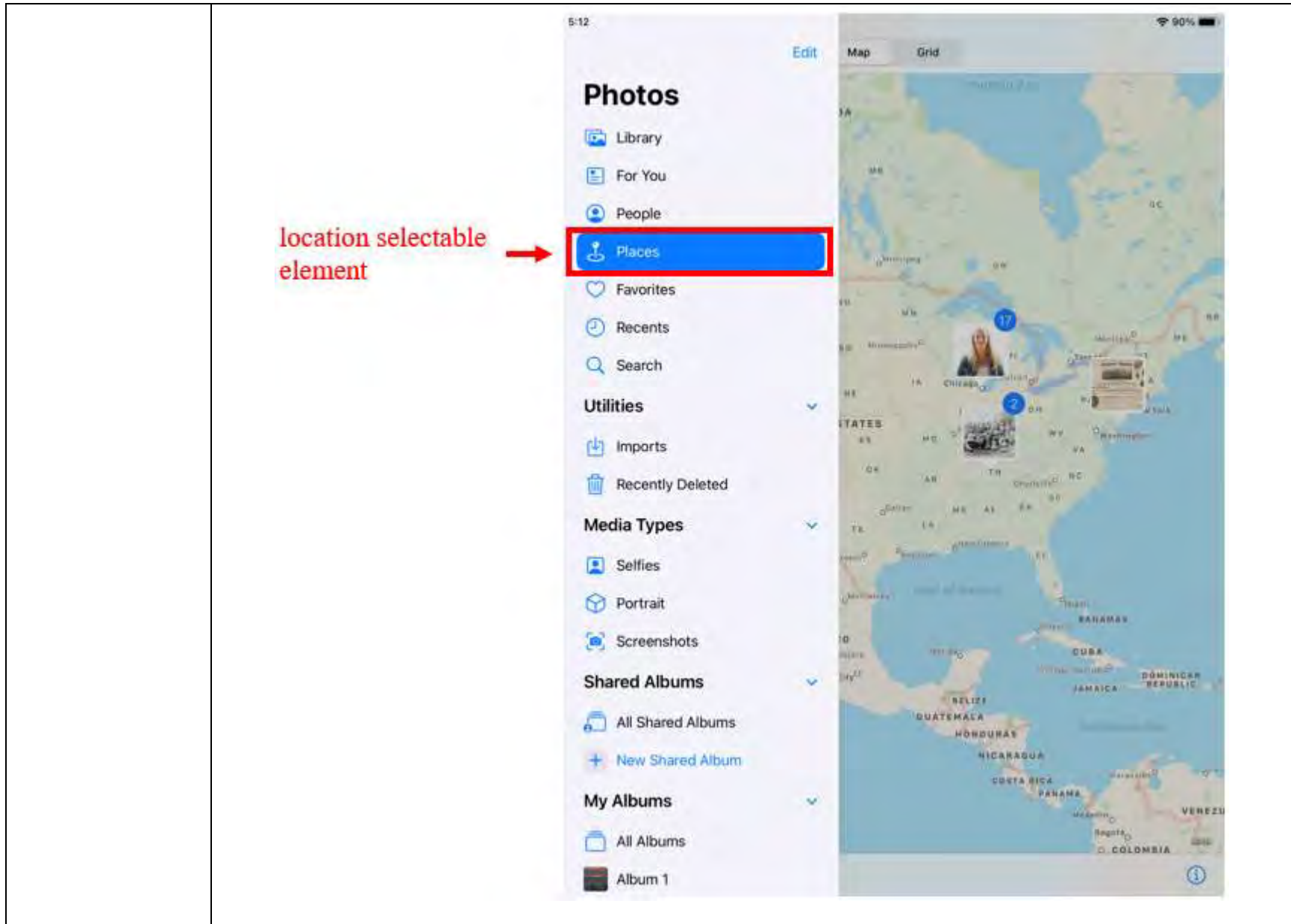
**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

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: '&lt; Photos', 'Years', 'Months', 'Days', and 'All Photos'. Below this, a date range 'Nov 4, 2012 - Sep 13, 2021' is displayed, along with a geotag 'Chicago - Lincoln Park &amp; more'. The main area is a grid of various photographs, including people, dogs, and outdoor scenes, illustrating the application of geotags to digital content.</p>

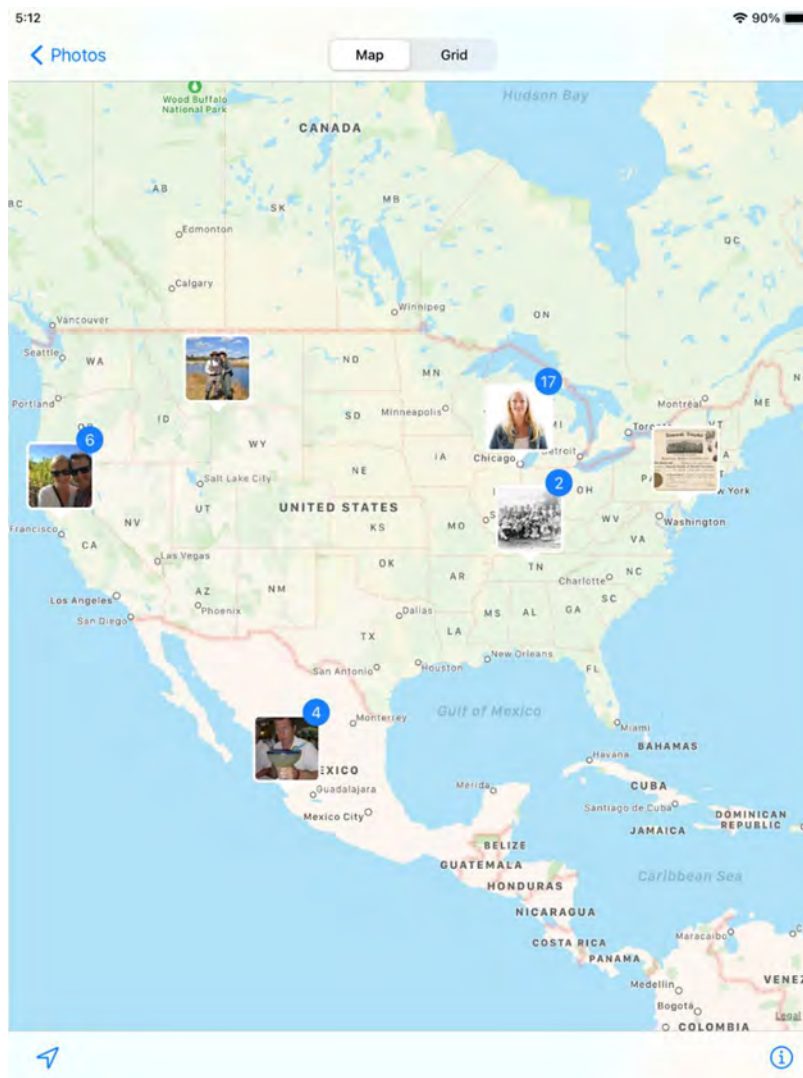
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<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).

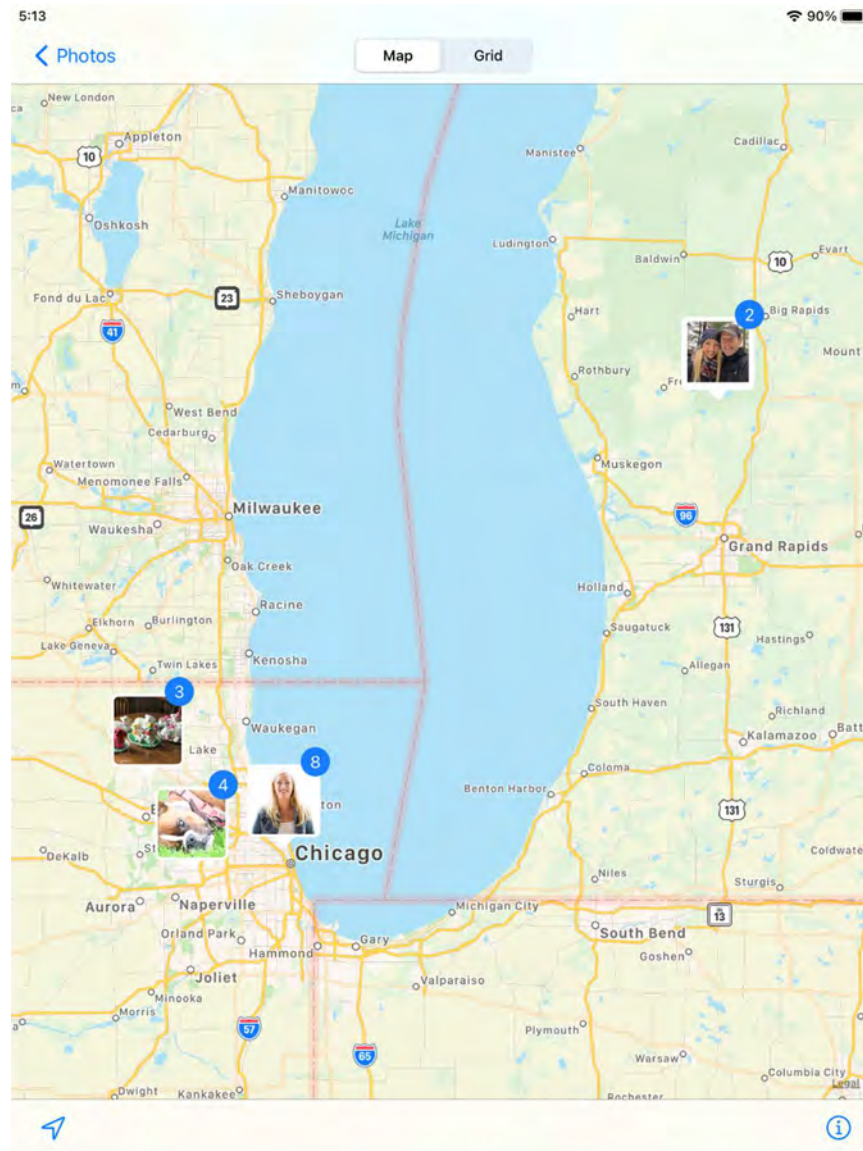


1[b][i] (i) a representation of an interactive map;

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

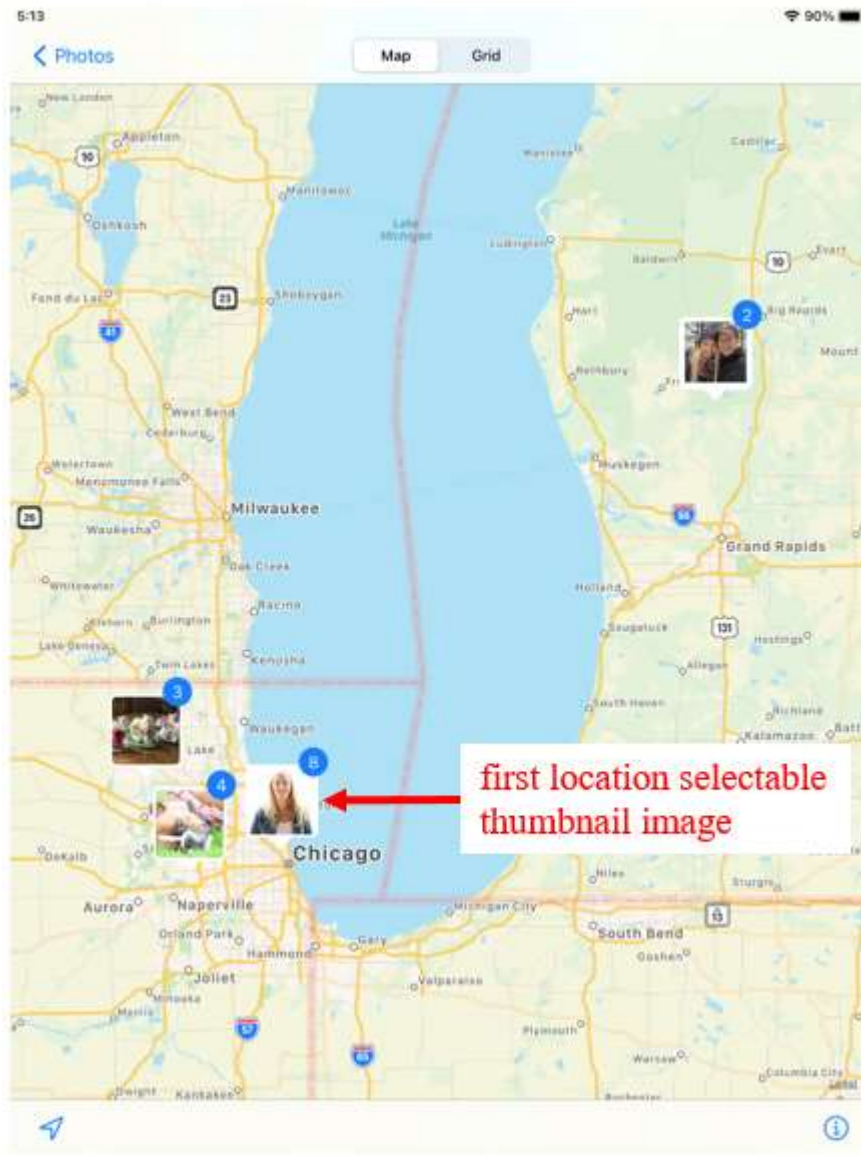


The map is interactive at least because a user can zoom in or out to see different locations, as shown below.



**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,

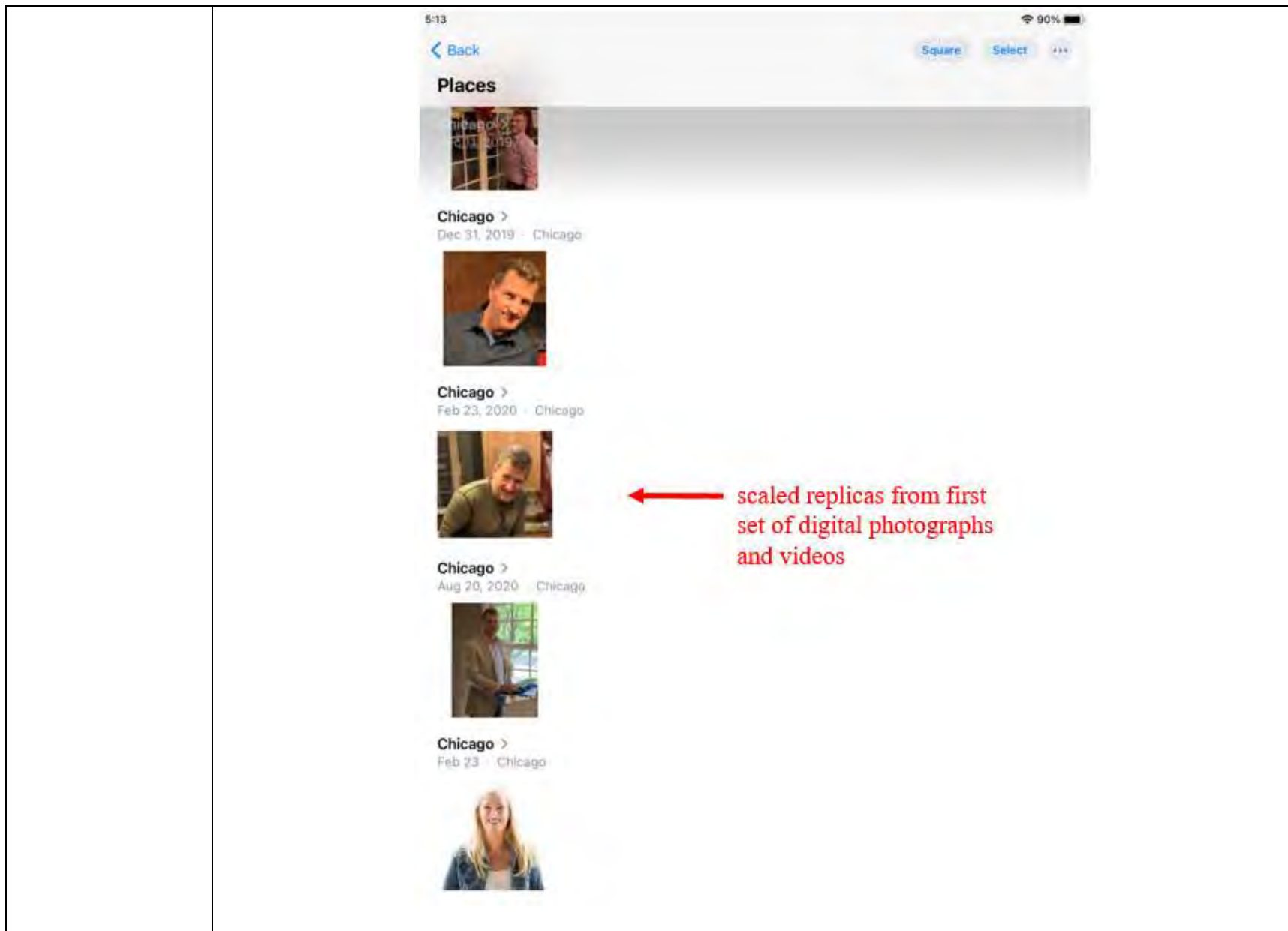
Displaying the map view includes displaying a first location selectable thumbnail image at a first location on the interactive map.




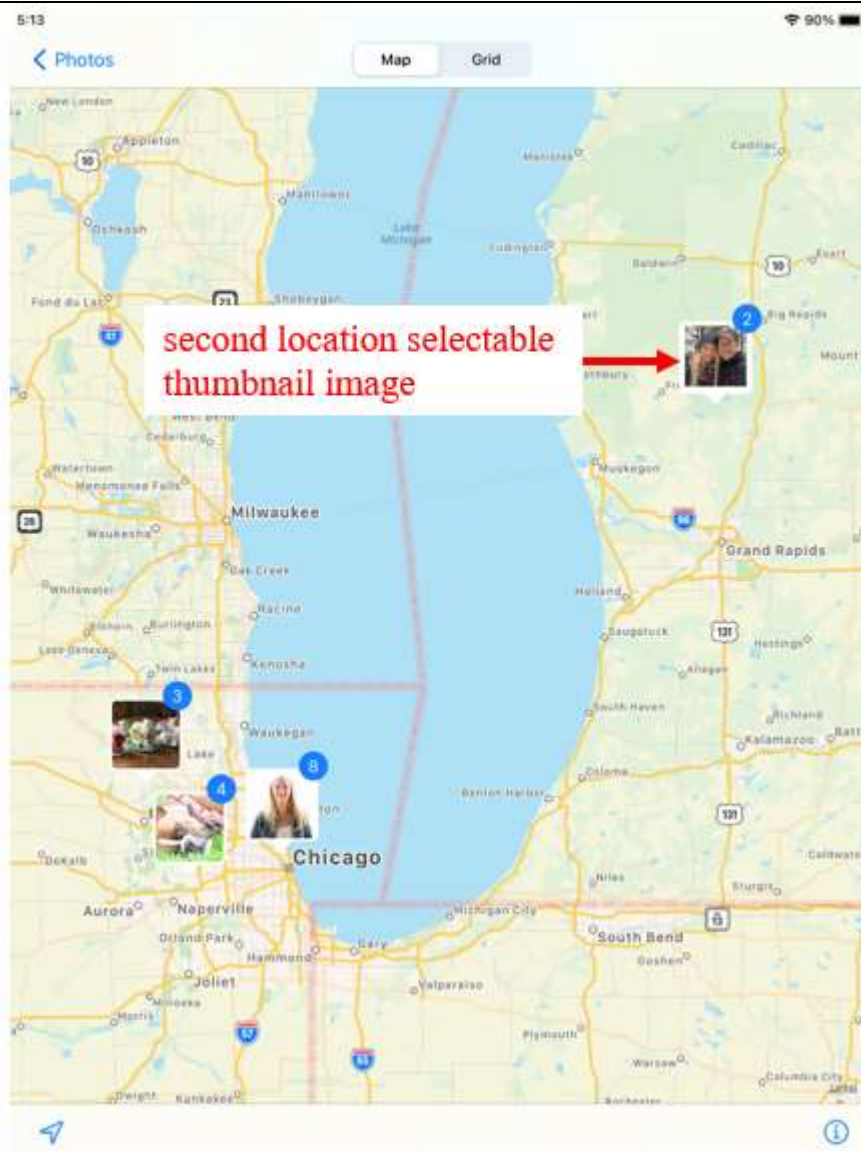
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

	<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>

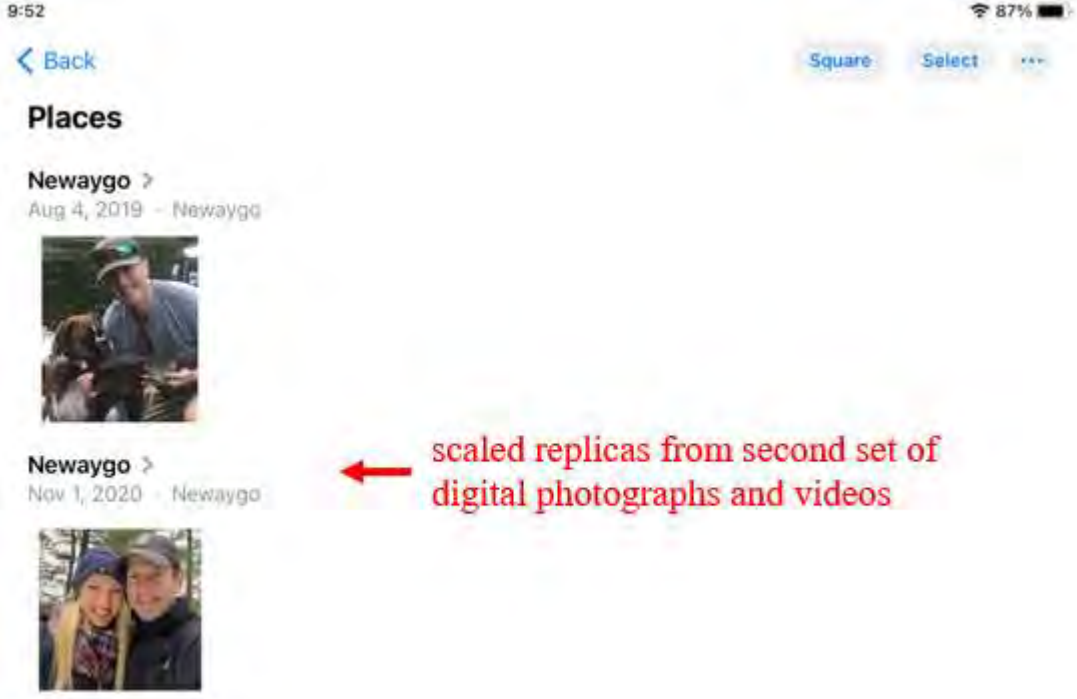





<p><b>1[b][iii]</b> (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number that corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;</p>	<p>Displaying 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 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>

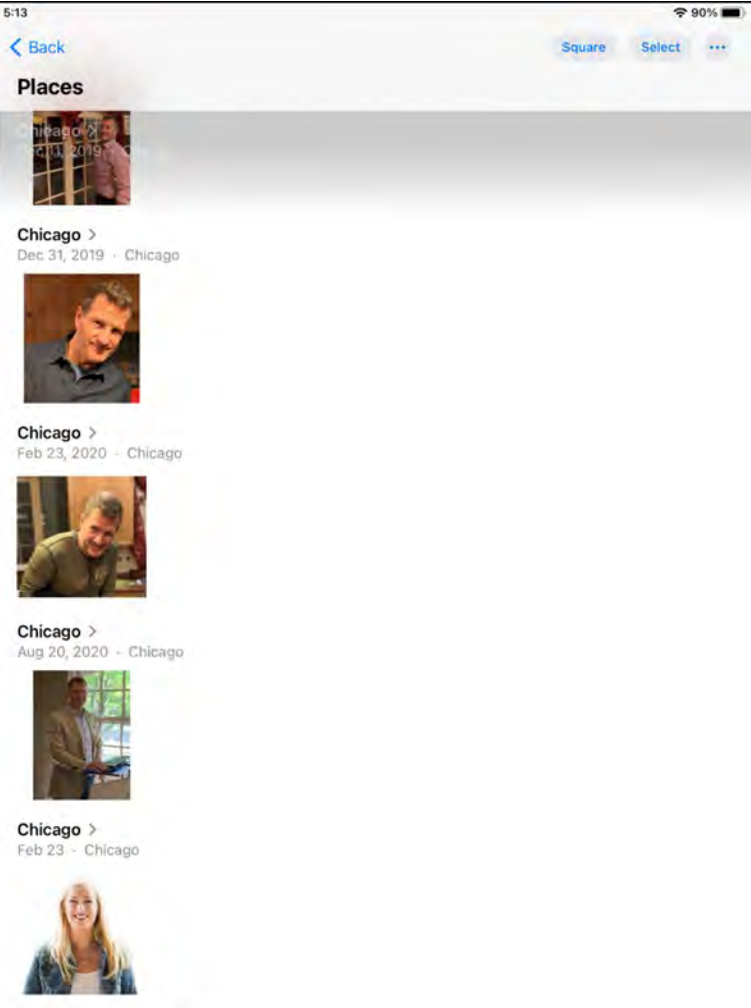



The second location is associated with the geographic coordinates of a second geotag. In this example, the second location selection thumbnail is associated with Newaygo, MI. *See also* information for limitation 1[b][iv][A].

<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>

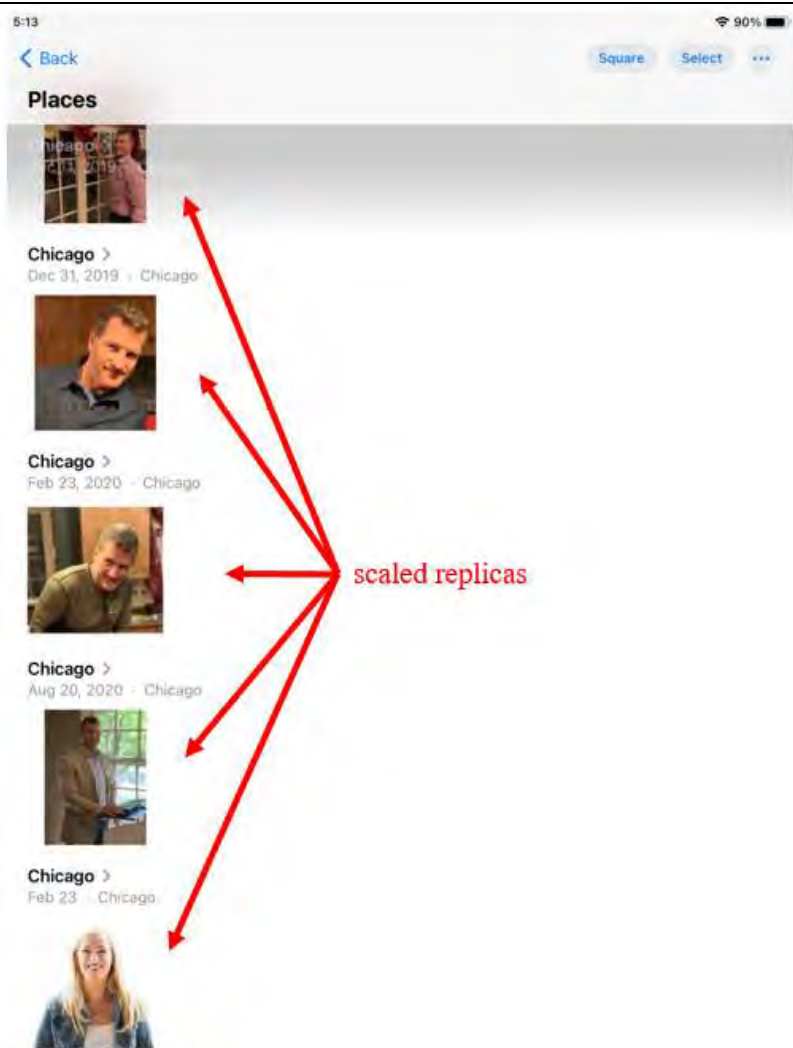
<p>number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;</p>	 <p>The image shows a map with a blue circular icon containing the number '2'. A red arrow points from the label 'second number' to the icon. Another red arrow points from the label 'second count value image' to the icon. A third red arrow points from the label 'second location selectable thumbnail image' to a thumbnail image of a couple. The map shows a road and some greenery.</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. At the top, there is a 'Back' button, 'Square' and 'Select' buttons, and a battery indicator at 90%. Below the 'Places' header, there is a list of geotags. The first geotag is 'Chicago' with a right-pointing chevron, a date of 'Dec 31, 2019', and a photo of a man. Below it are three more geotags, all labeled 'Chicago' with chevrons, dates, and photos: 'Feb 23, 2020' with a man's photo, 'Aug 20, 2020' with a man's photo, and 'Feb 23' with a woman's photo.</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>

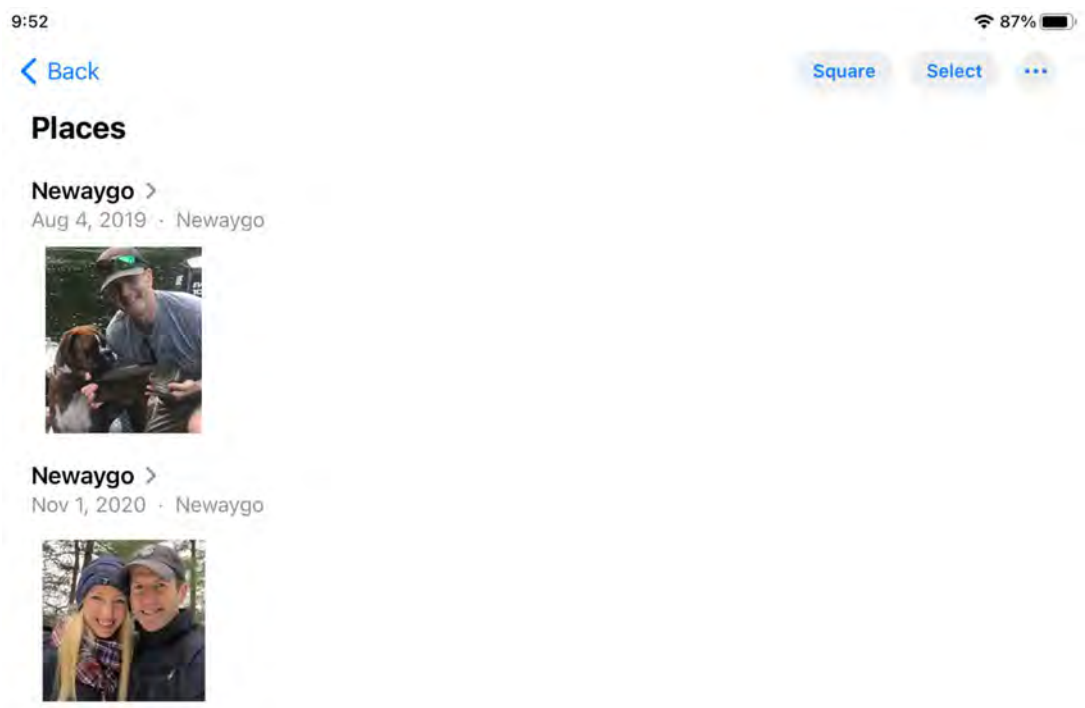
	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button, 'Square' and 'Select' options, and a battery indicator at 90%. Below the title 'Places', there is a grid of photo thumbnails. Each thumbnail has a red box around the word 'Chicago' and a smaller red box around the date. A red arrow points to the 'Chicago' tag on the first thumbnail, with the text 'first location name' next to it.</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

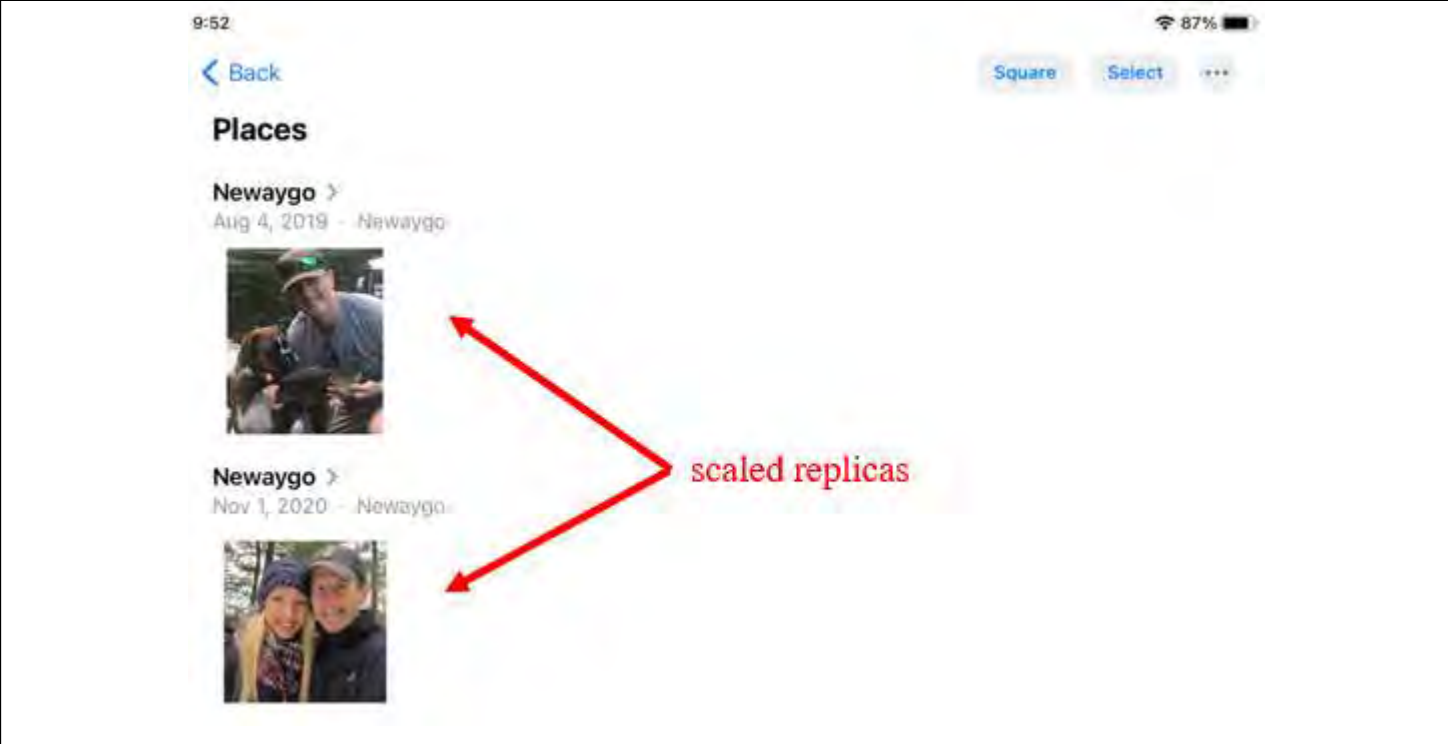


*See also* information for limitation 3[a]. As shown above, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. *See* information for limitation 1[b][i].

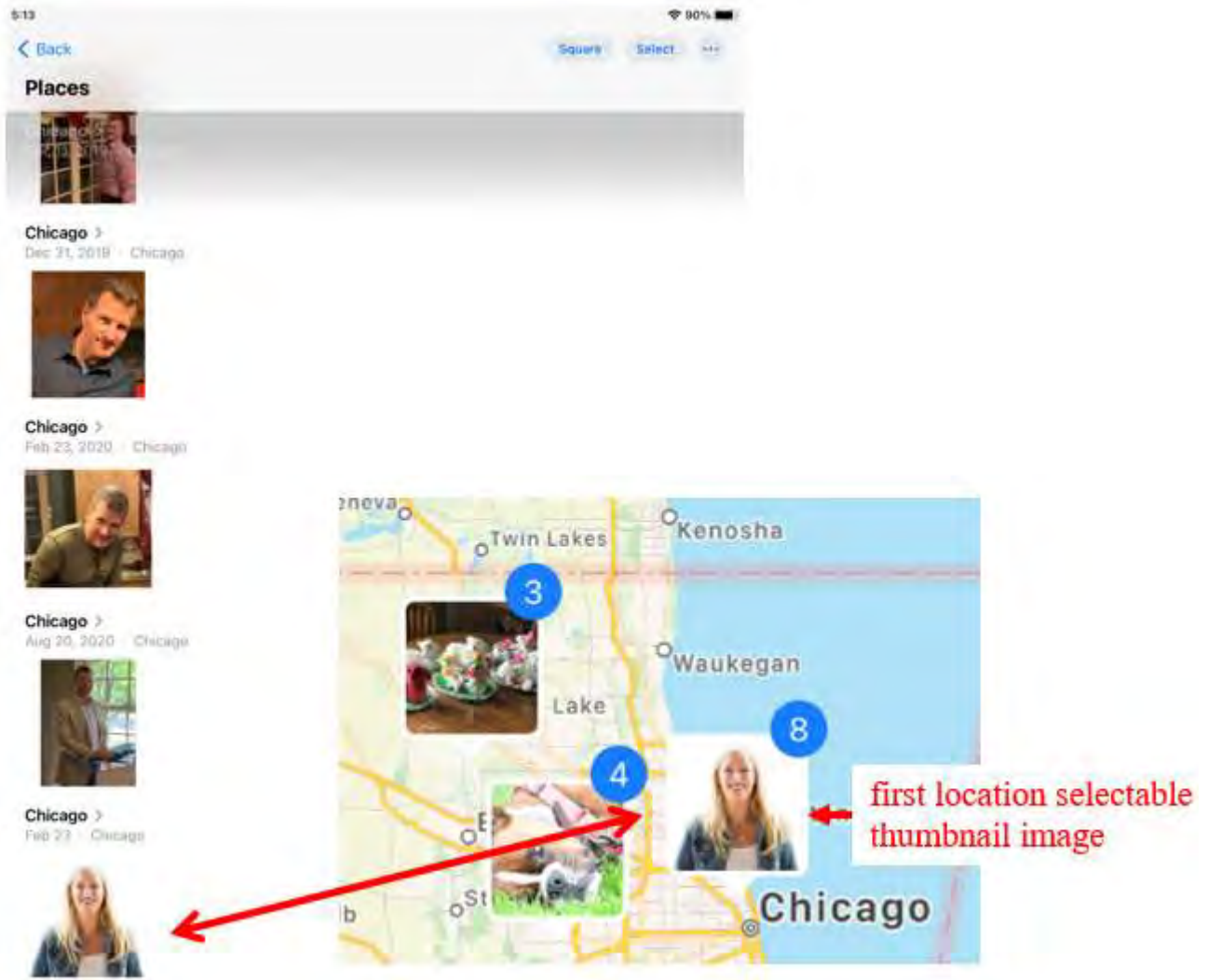


<p><b>1[d]</b> responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video display device, the displaying the second location view including displaying</p>	<p>Responsive to a click or tap of the second location selectable thumbnail image, 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, Newwaygo) 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>

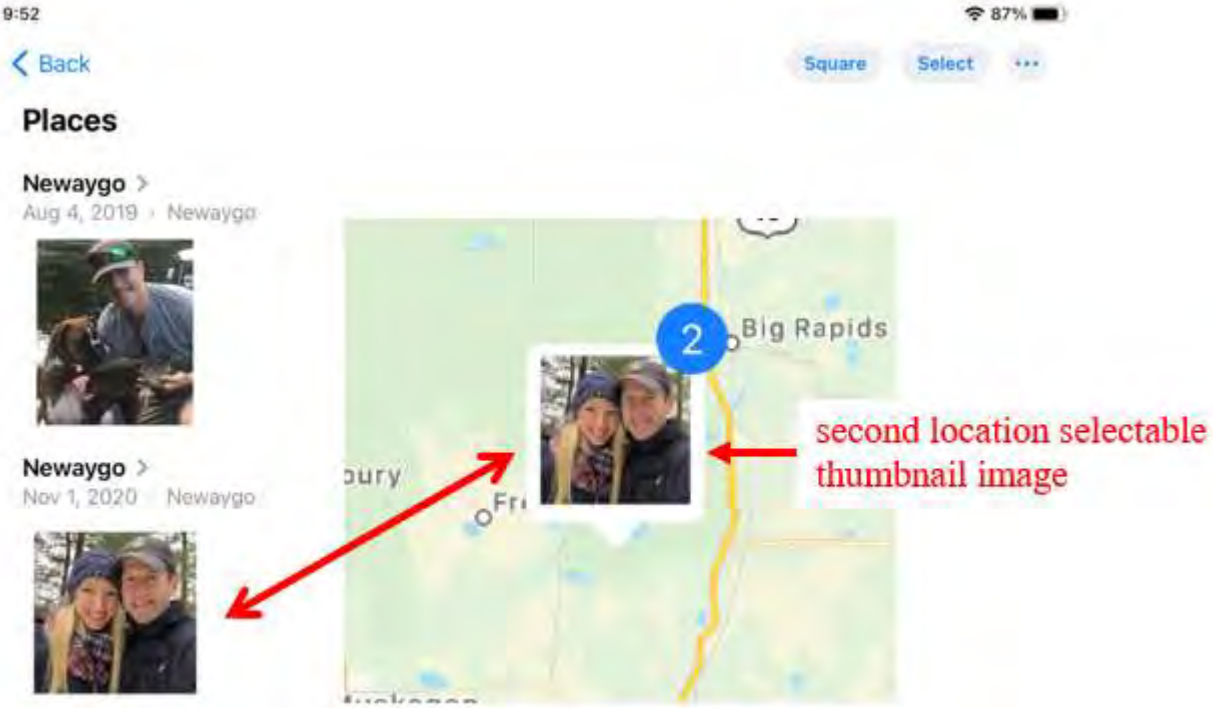
<p>second set of digital photographs and videos not being overlaid on the interactive map.</p>	 <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> information 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

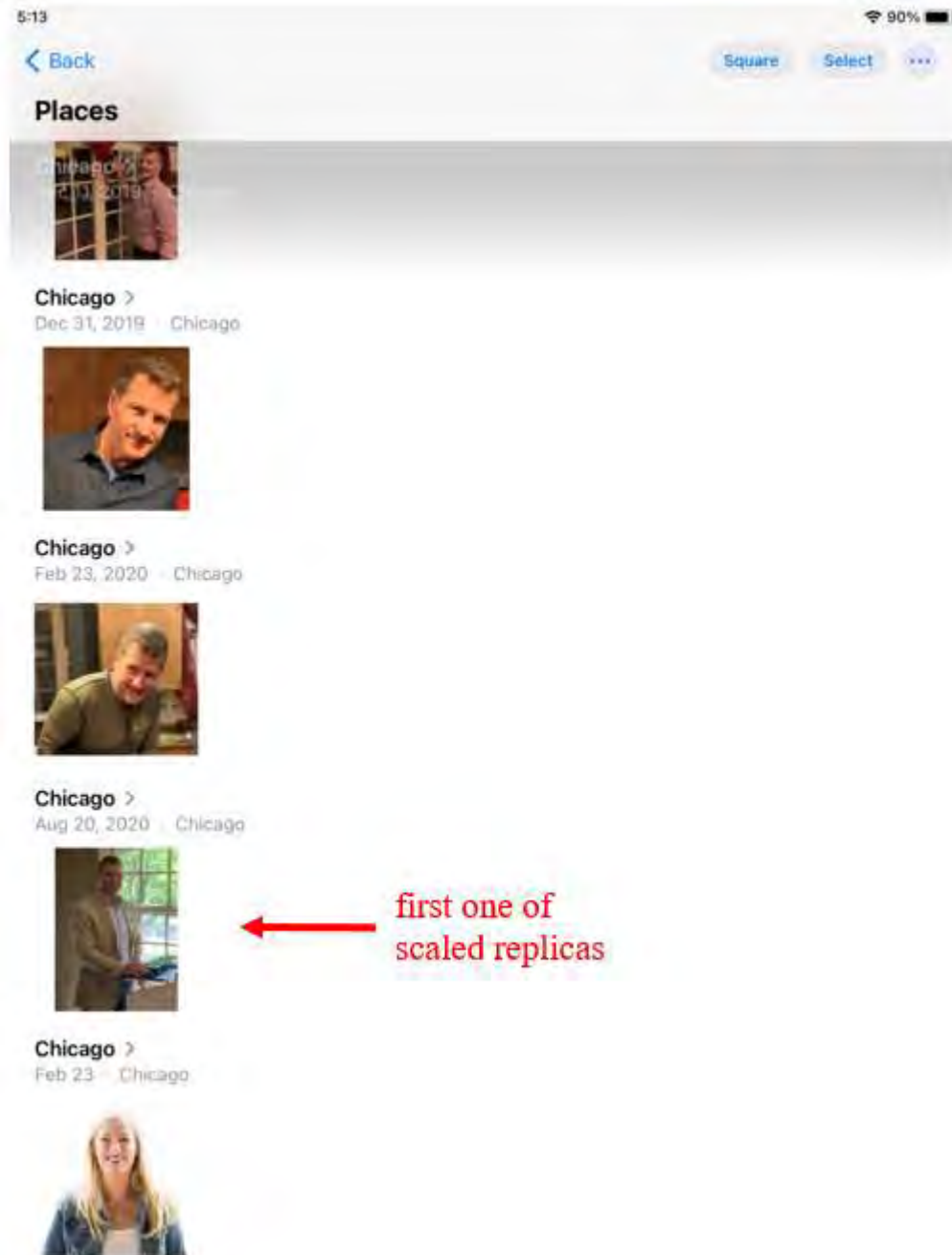


**2[b]** and wherein the second location selectable thumbnail image includes a scaled

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



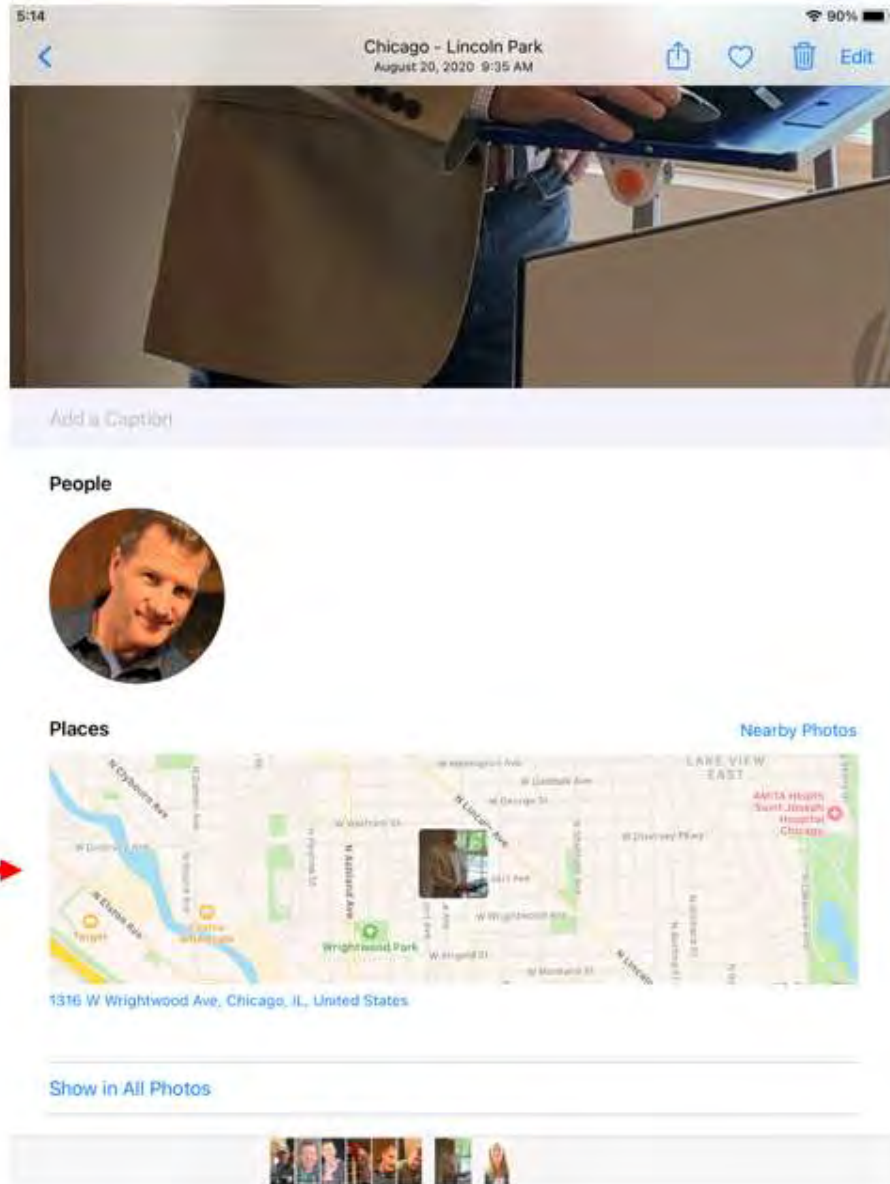


Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS


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



first map image →

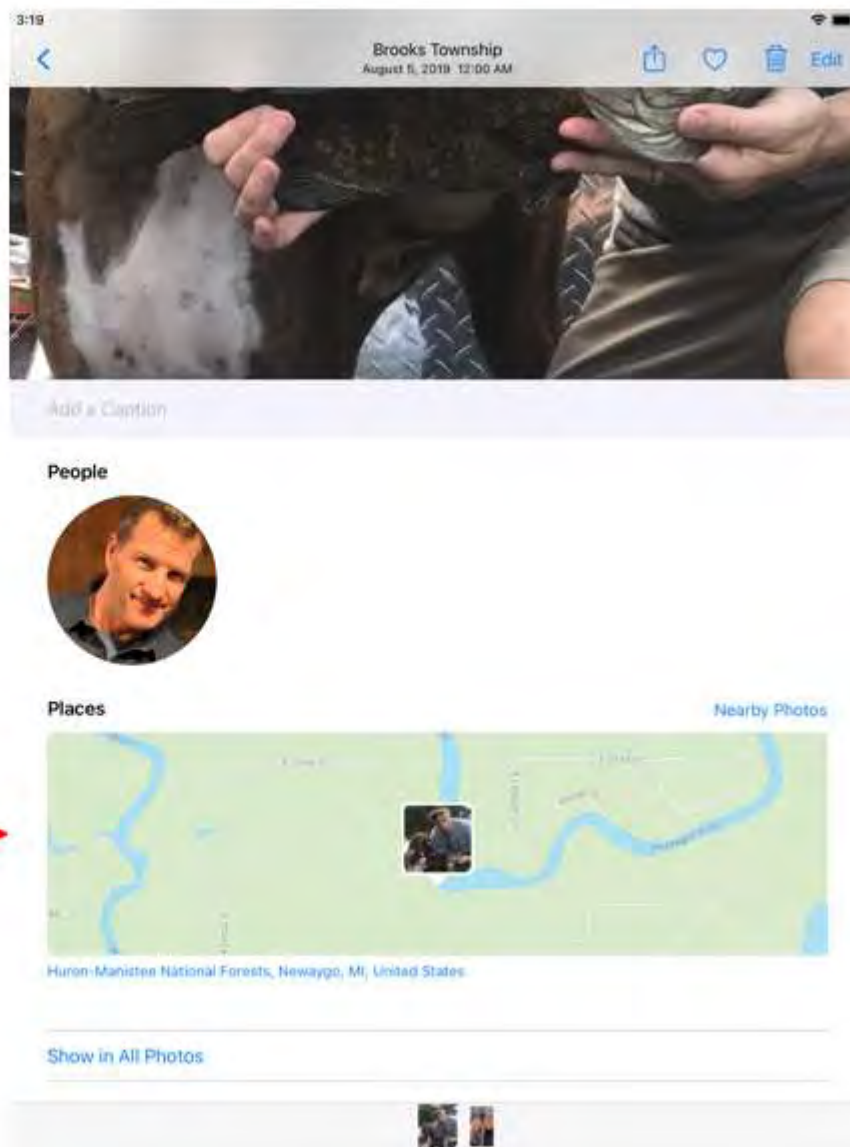
<p><b>4[pre]</b> The computer-implemented method of claim 3, further comprising</p>	<p>See information for claim 1.</p>
<p><b>4[a]</b> responsive to a click or tap of a first one of the displayed scaled replicas in the second location view, displaying a first digital photograph associated with the first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

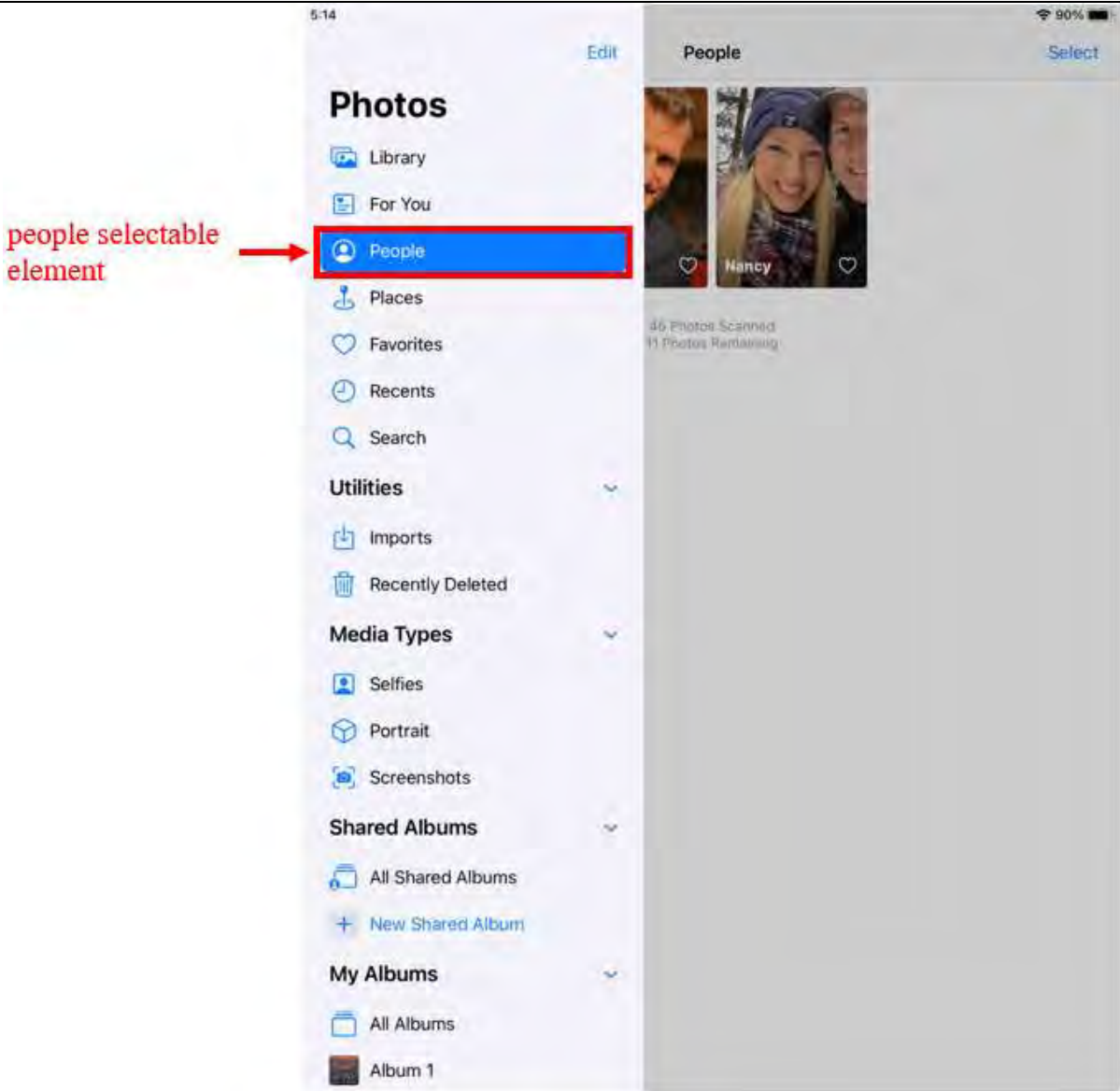
coordinates of the second geotag.



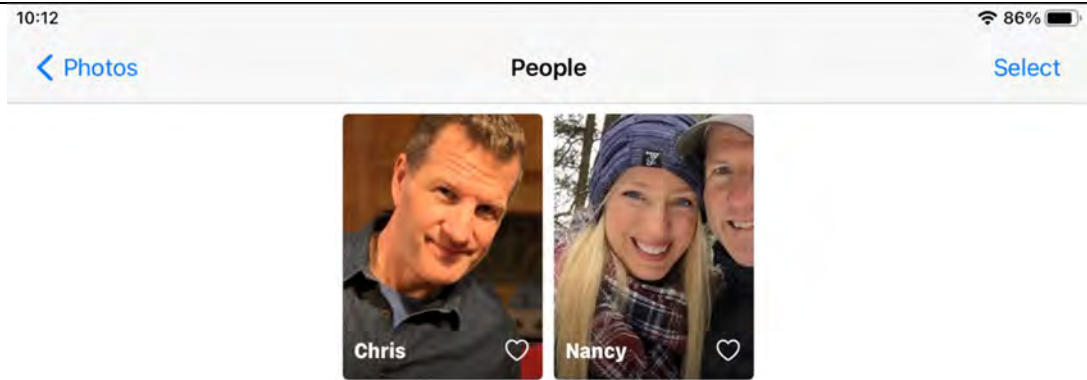
second map image →

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

<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 people selectable element,</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>

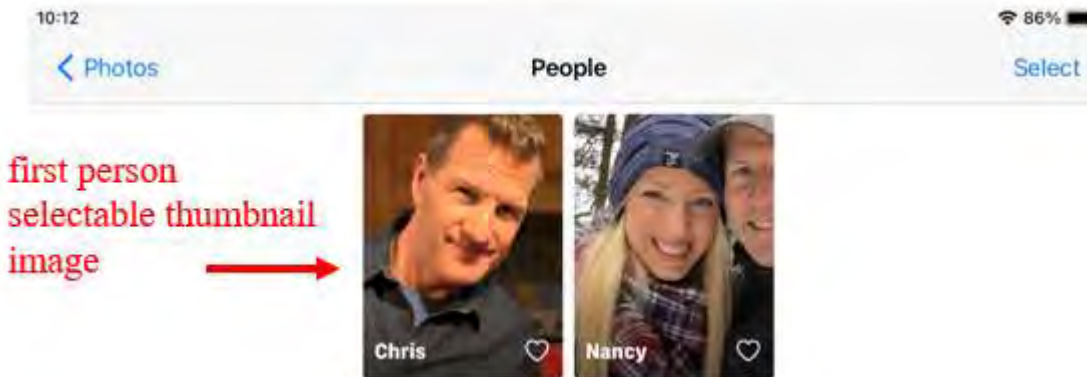
	 <p>The screenshot shows the iPadOS Photos app interface. On the left, a sidebar menu lists various photo categories: Photos, Library, For You, People (highlighted in blue), Places, Favorites, Recents, Search, Utilities, Media Types, Shared Albums, and My Albums. A red arrow points to the 'People' item, 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:

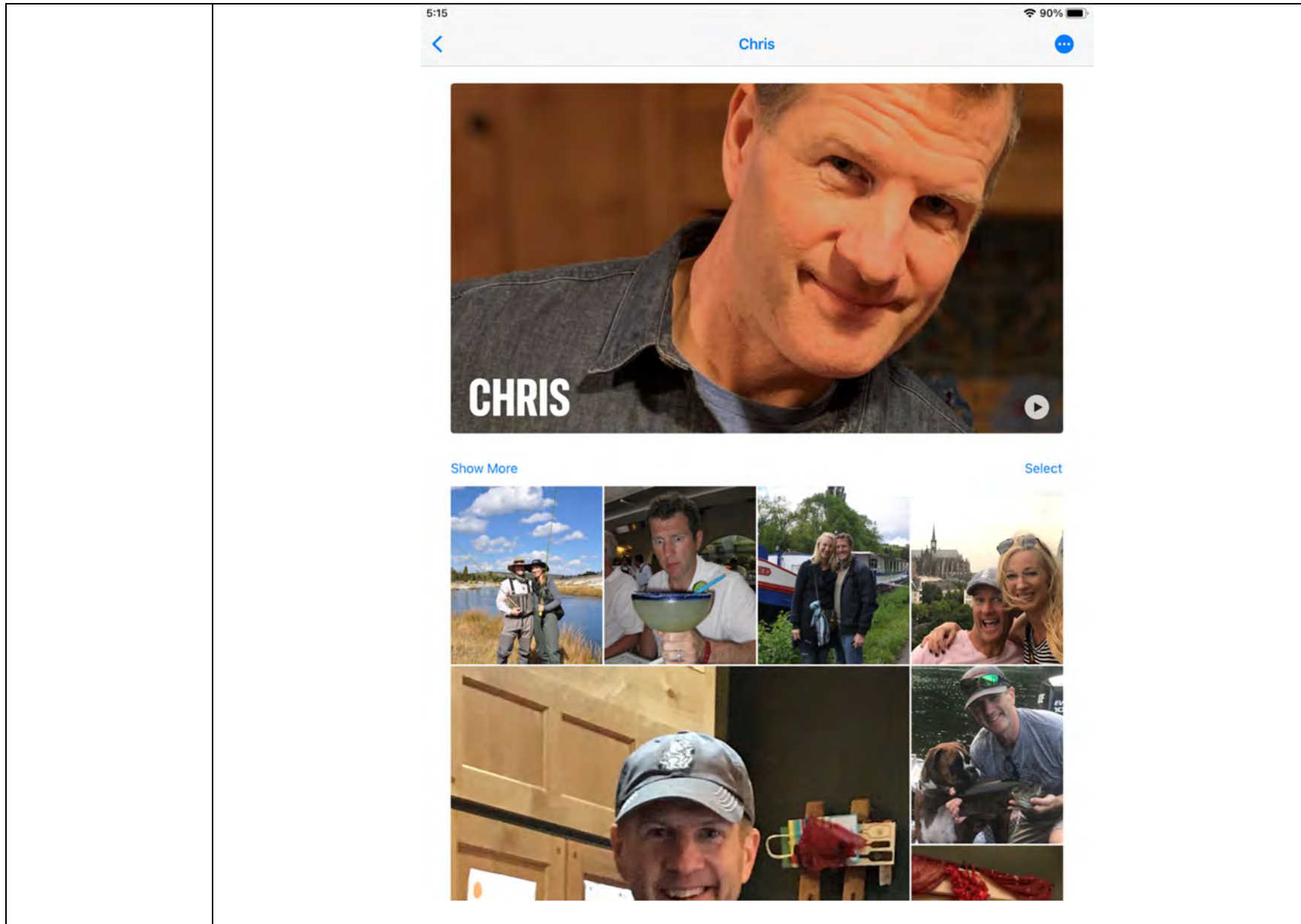


5[c] (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;

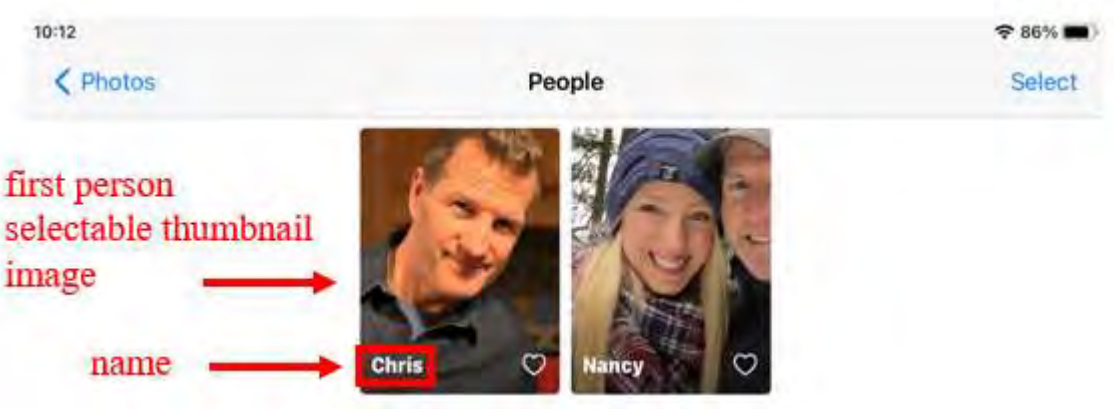
The people view includes a first person selectable thumbnail image including an image of a face of a first person:



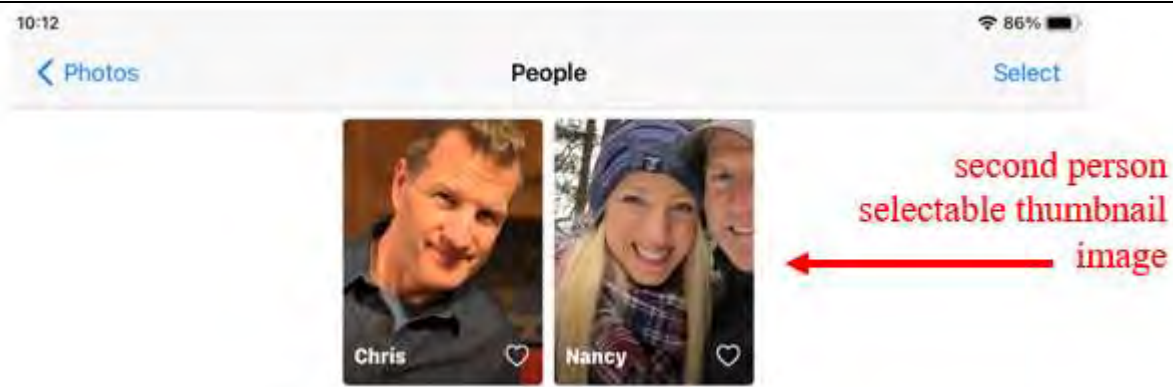
As shown, the first person selectable thumbnail image is associated with a third set of digital photographs and videos:






<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>

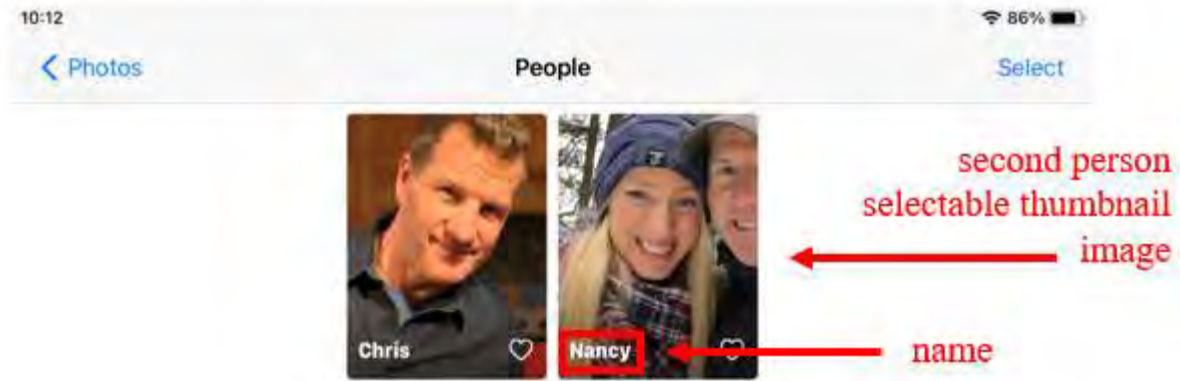
photographs and videos including digital photographs and videos associated with the second person; and



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 5:15, a signal strength indicator, and a battery level of 90%. Below the status bar is a navigation bar with a back arrow on the left, the name 'Nancy' in the center, and a three-dot menu icon on the right. A 'Select' button is visible in the top right corner of the gallery view. The main content area displays a large photo of two people fishing on a riverbank. Below this main photo is a row of five smaller thumbnail images. The second thumbnail from the left shows a person touching a stone wall, and the name 'Nancy' is displayed in blue text to its right. Below the thumbnails is a portion of a circular image.</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.

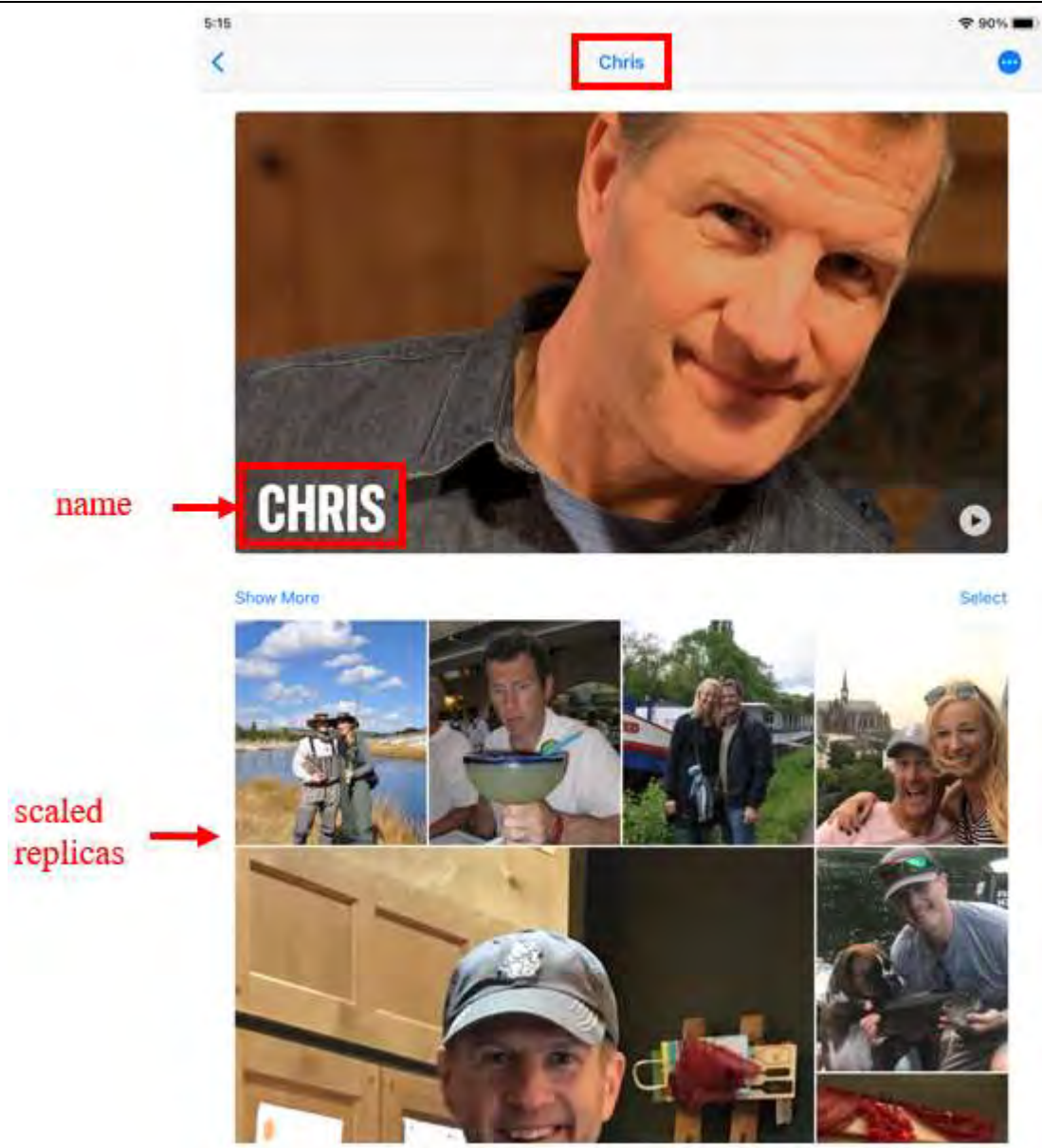


To the extent it is found that the name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the 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

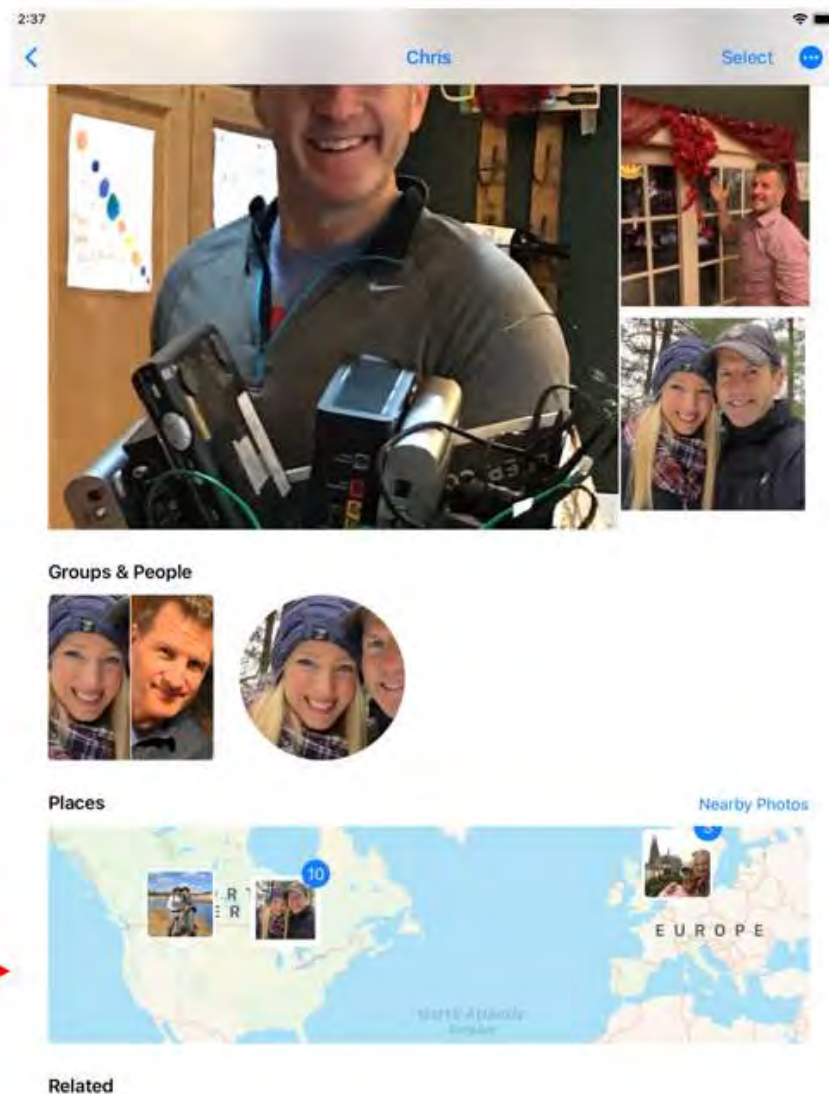
iPadOS displays a first person view responsive to a click or tap of the first person selectable thumbnail image. As shown, the first person view includes the name associated with the first person and scaled replicas of the photos and videos in the third set of digital photographs.

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.



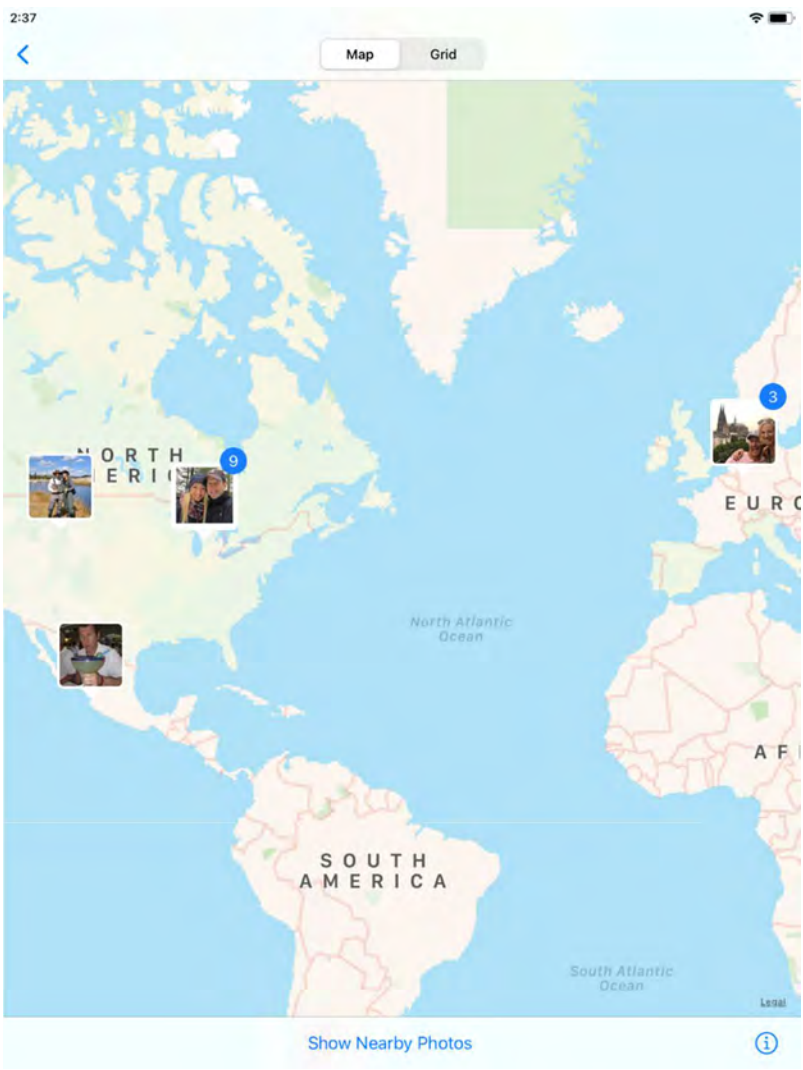
8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a first-person-location selectable element.

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



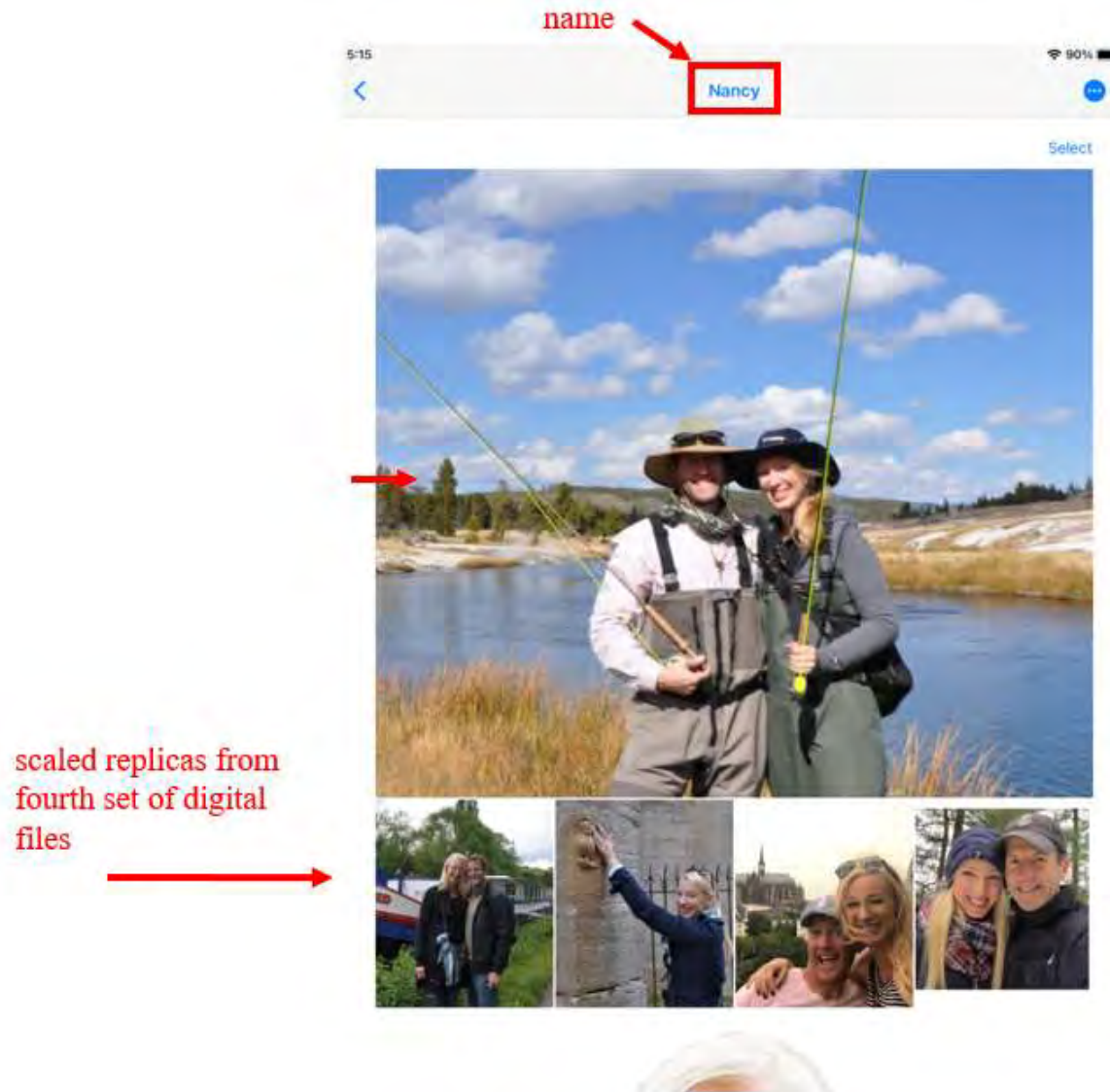
first-person-location  
selectable element



<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.

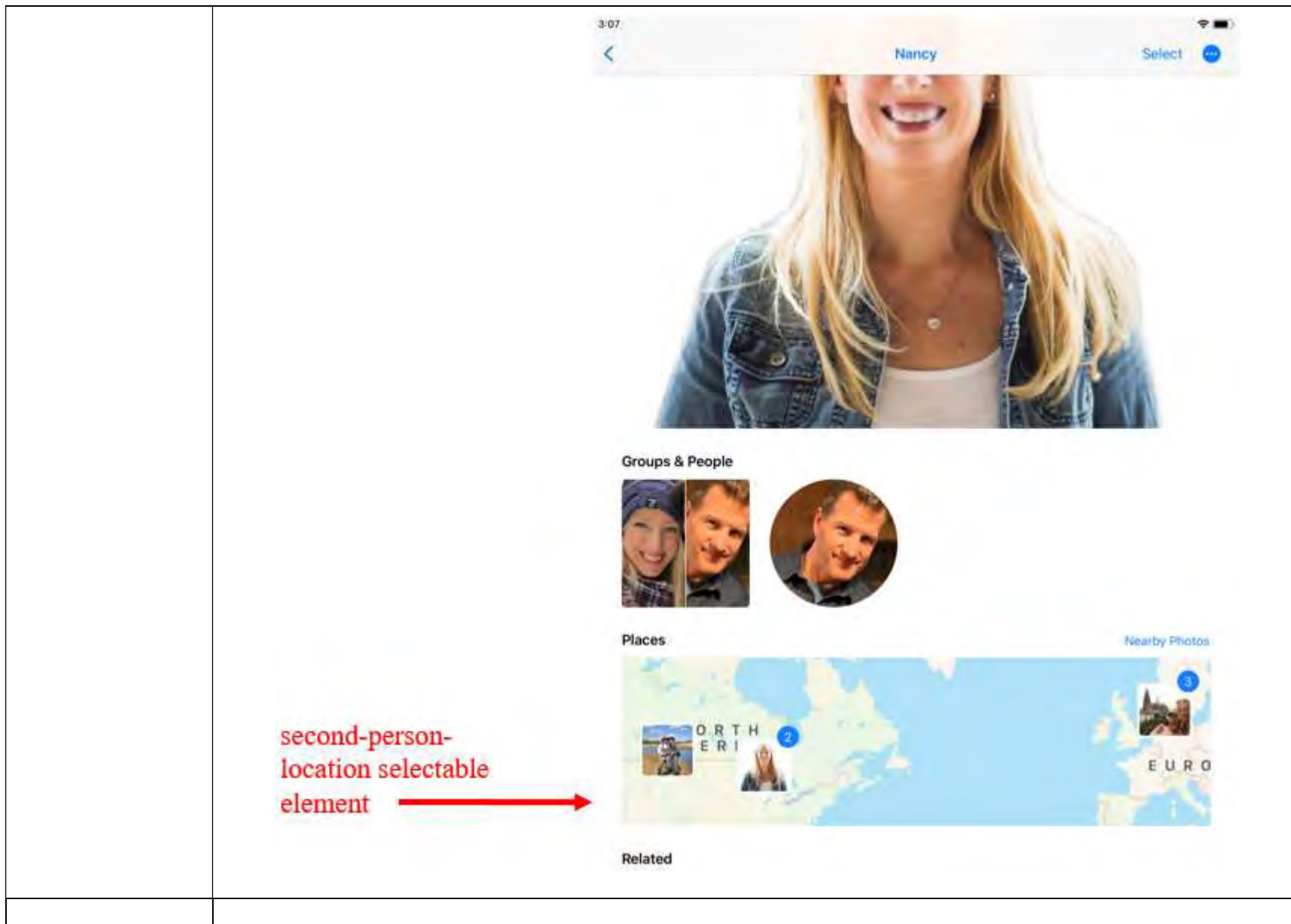
iPadOS displays a second person view responsive to a click or tap of the second person selectable thumbnail image. As shown, the second person view includes the name associated with the second person and a scaled replica of the photos and videos in the fourth set of digital photographs.





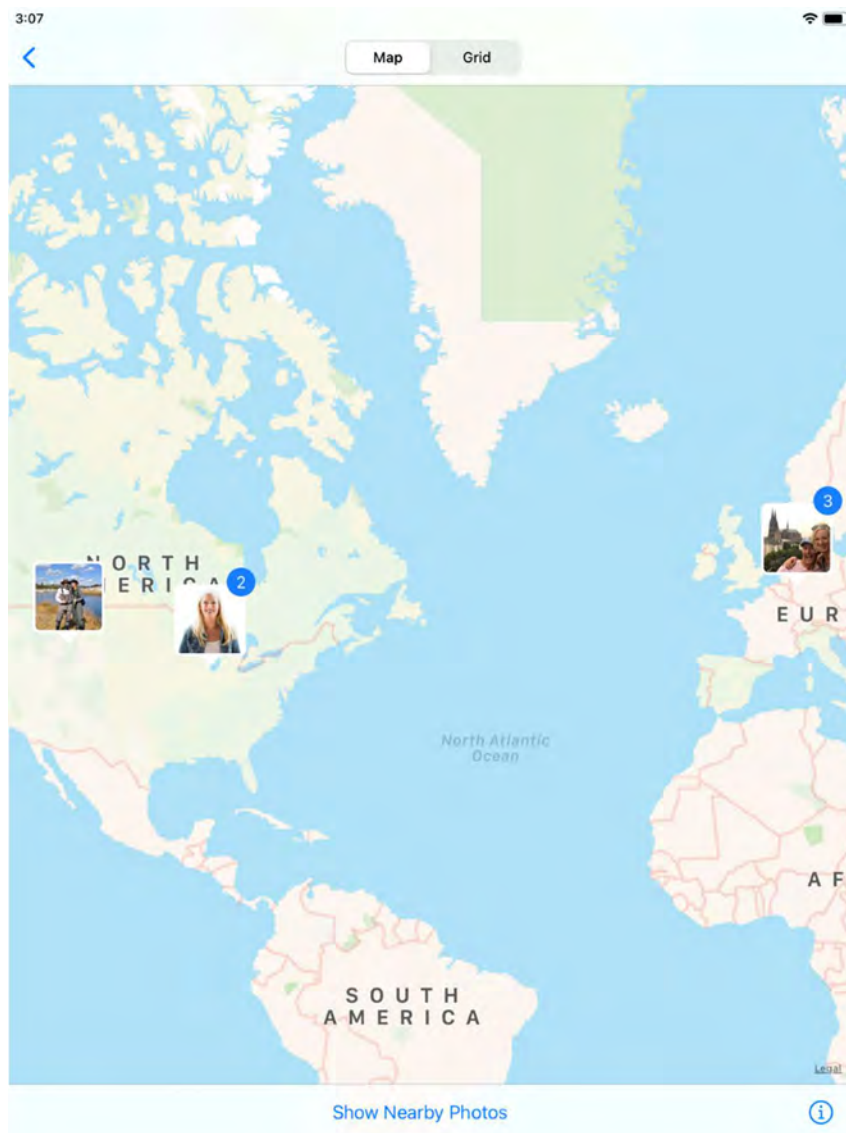
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<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.



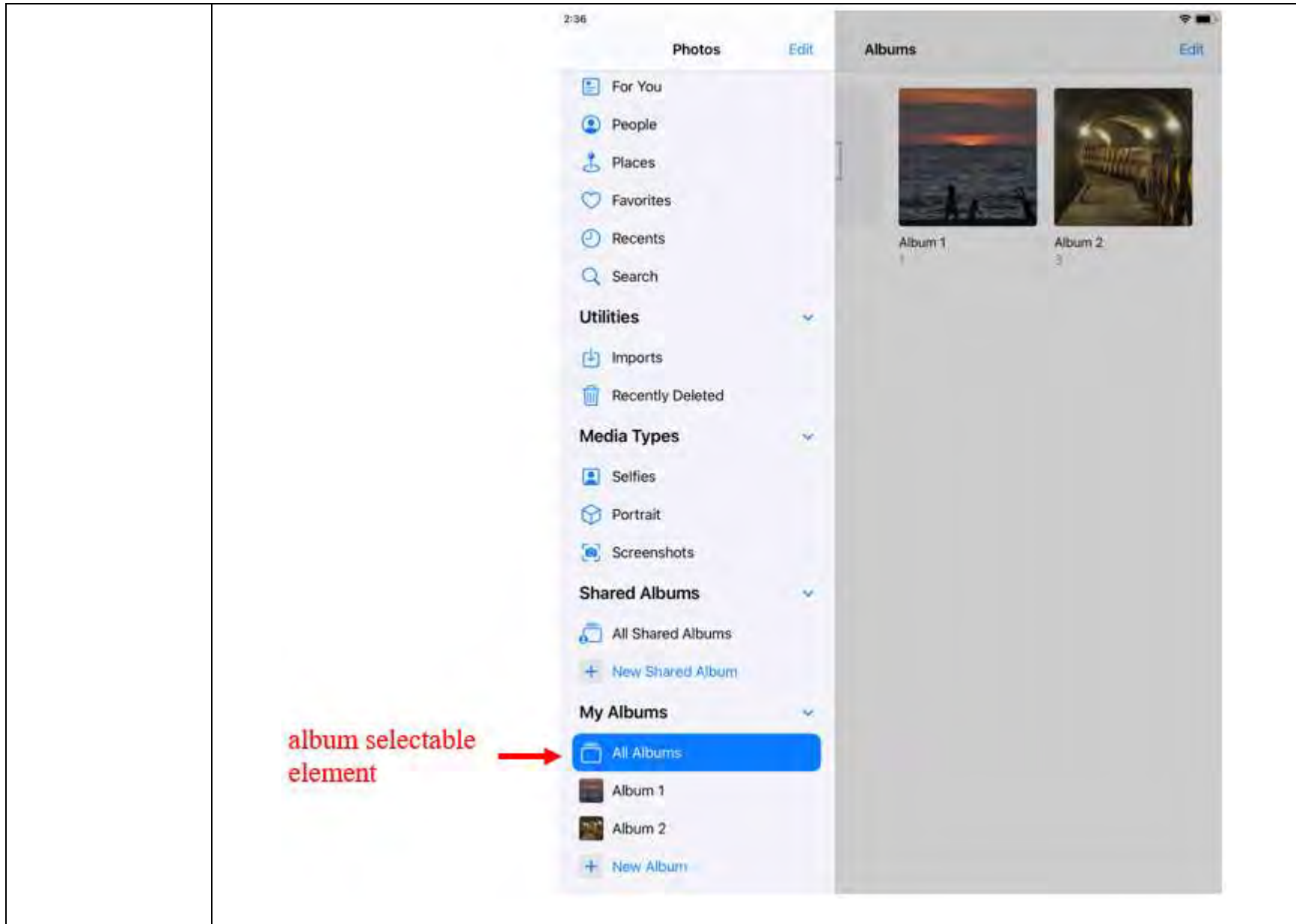
**12.** The computer-implemented method of claim 11, further comprising responsive to a click or tap of the second-person-location selectable element, displaying a representation of all locations having a digital photograph or video associated with the second person.

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.



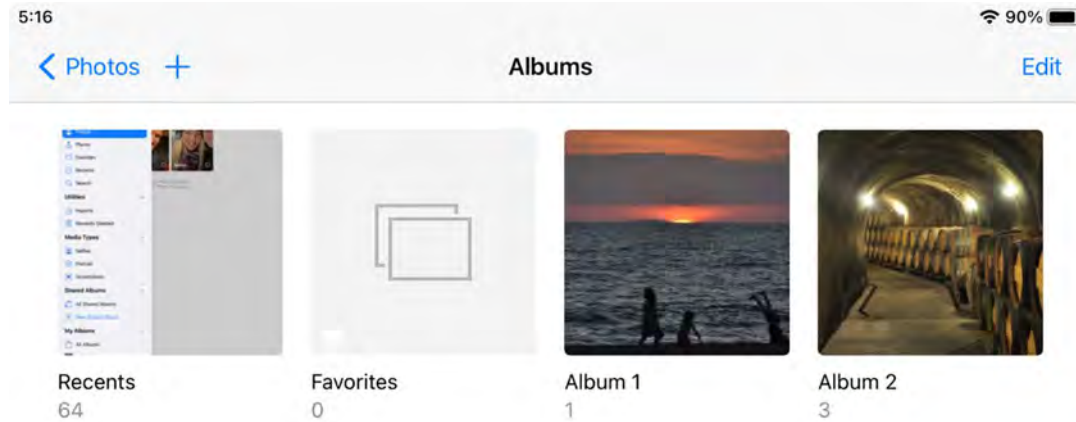
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

<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>



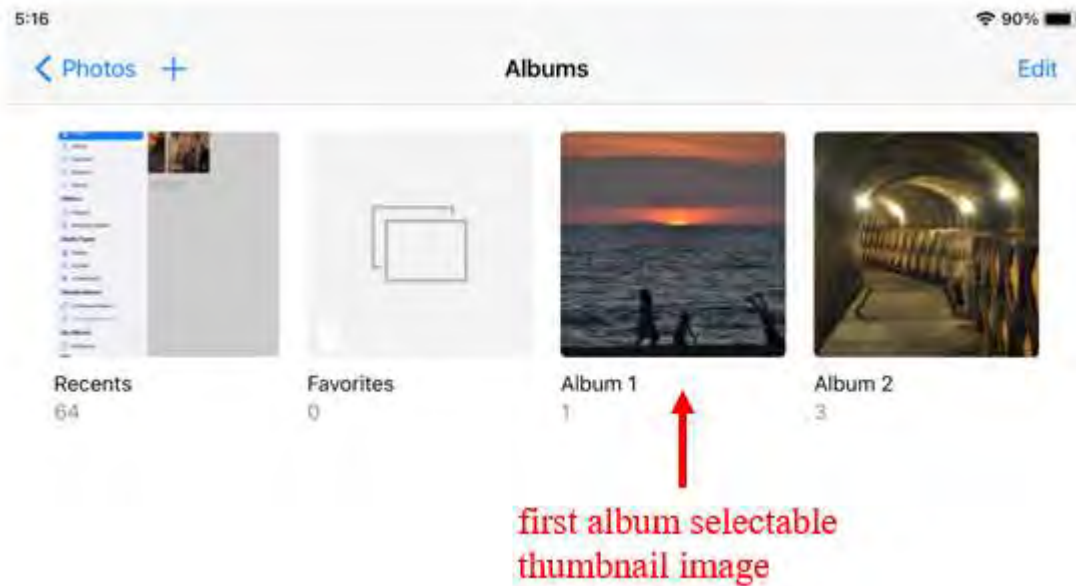
**13[b]** the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view including displaying:

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.

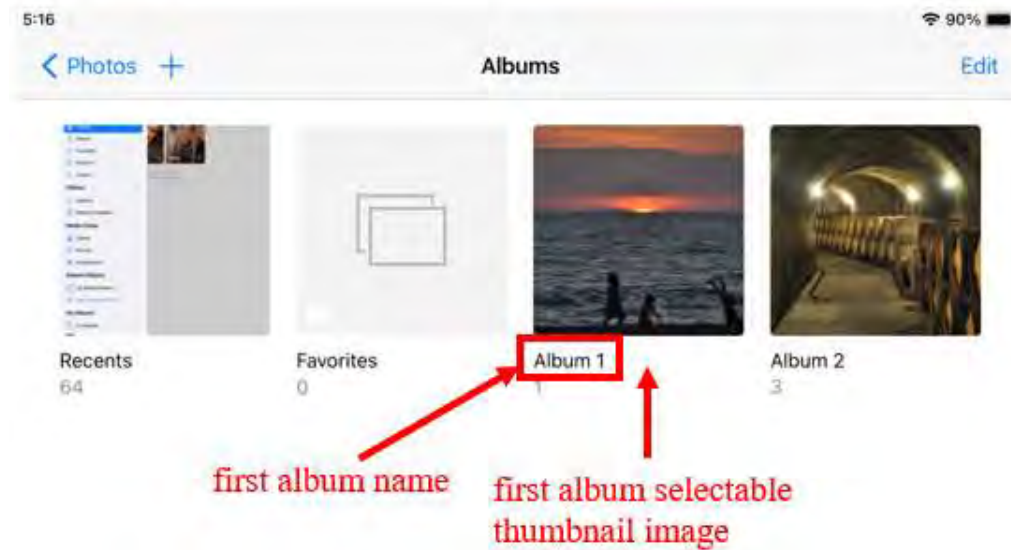


The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.



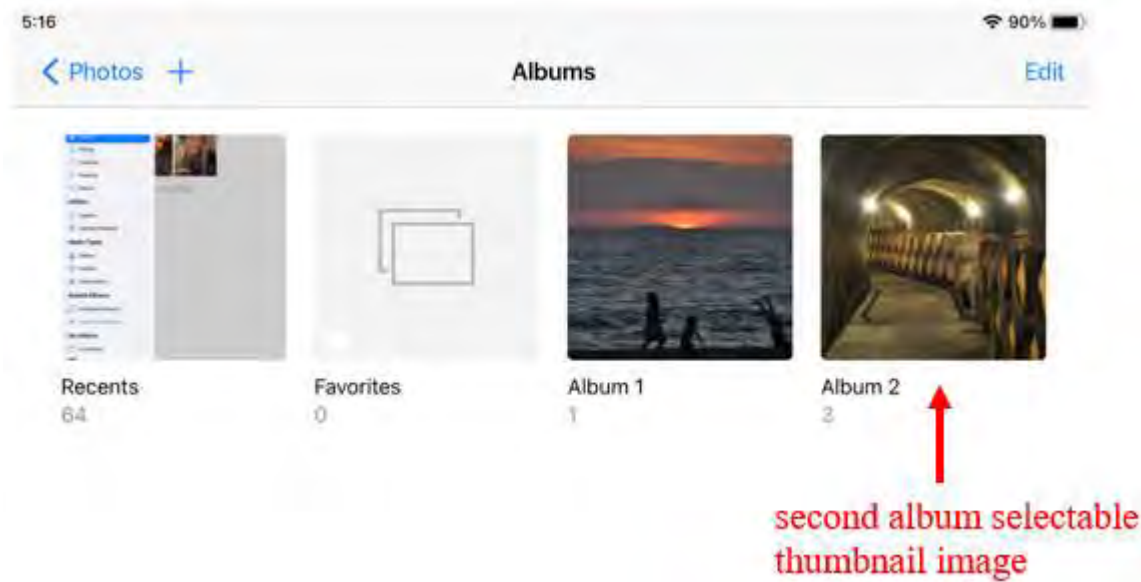
**13[c][ii]** (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;

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

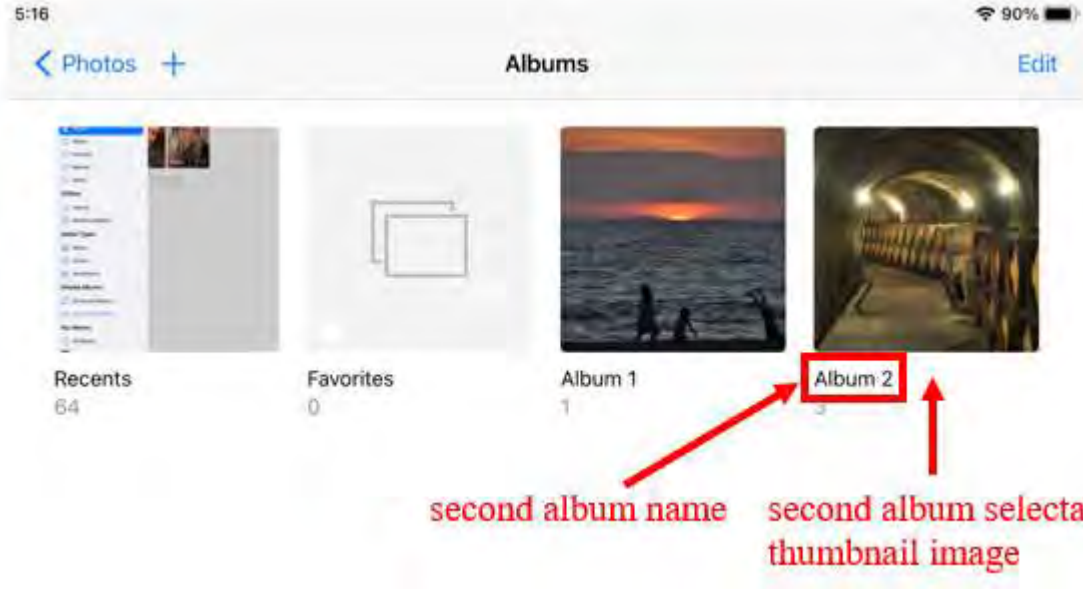

The album view includes a second album selectable thumbnail image.



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 hallway, and a close-up of a hand. A plus sign icon is to the right.</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><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><i>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.</i></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.*



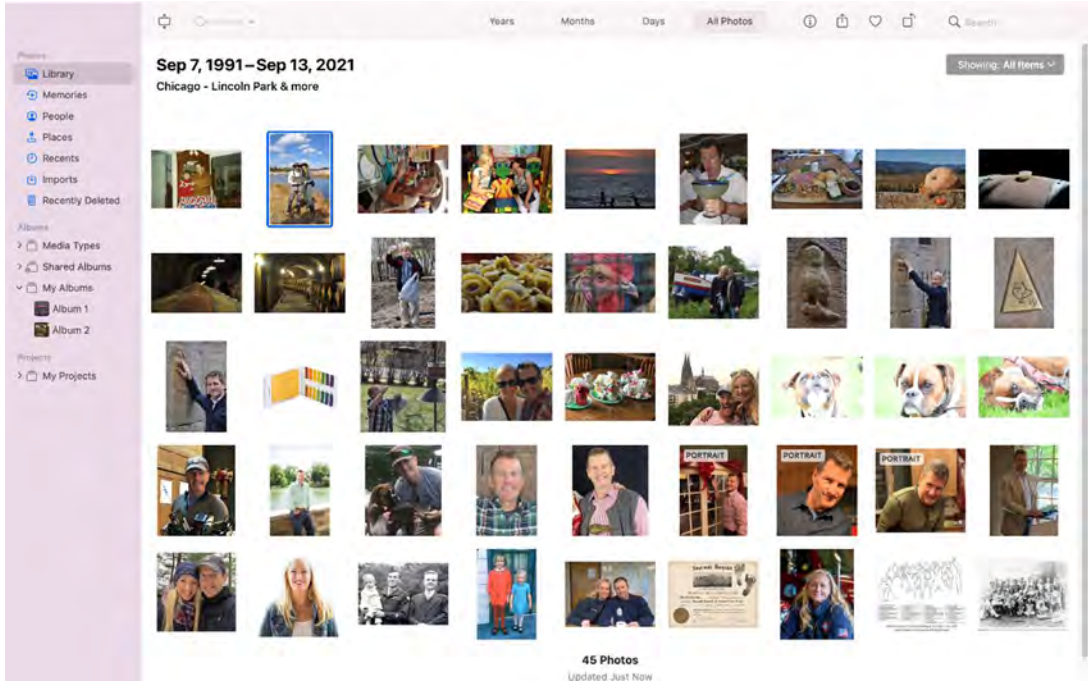
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – iPadOS

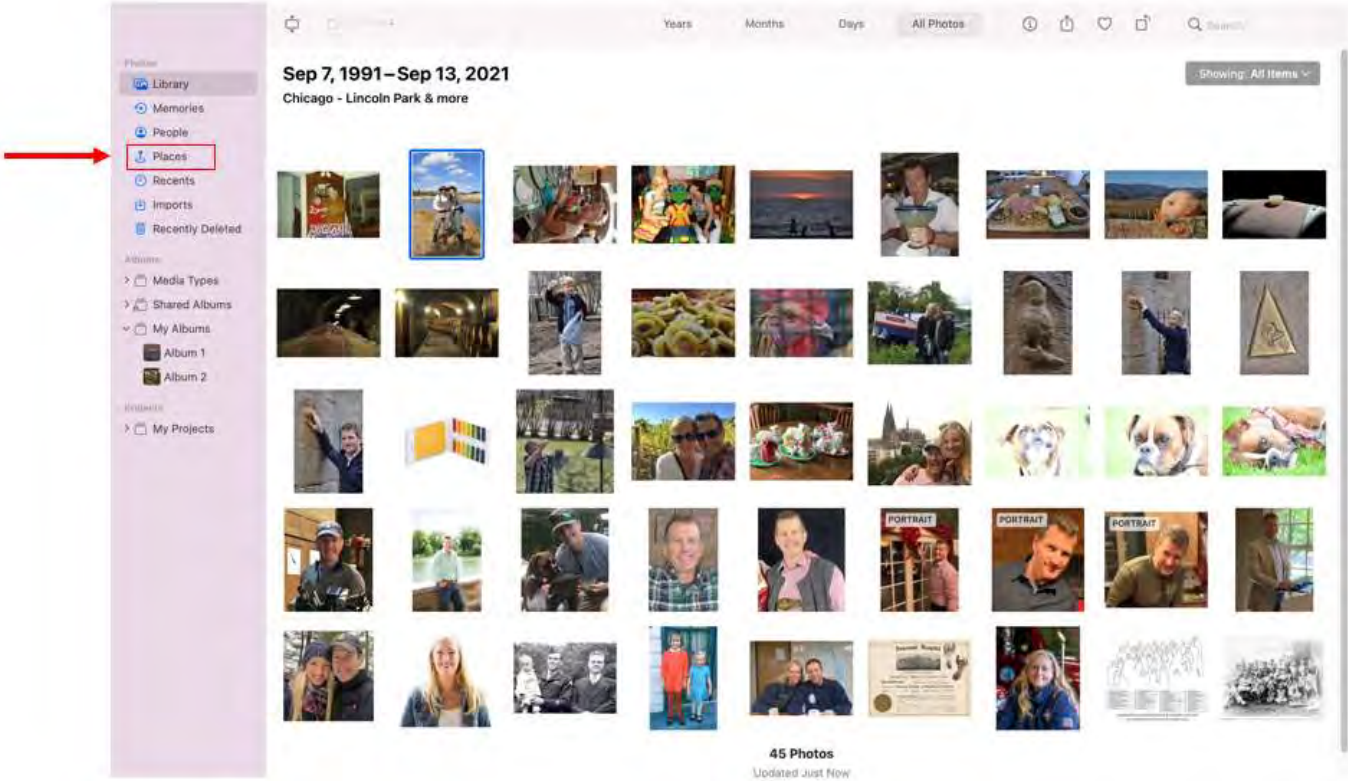
photographs and videos in the fourth set of digital photographs and videos.	

# **Exhibit B.3**

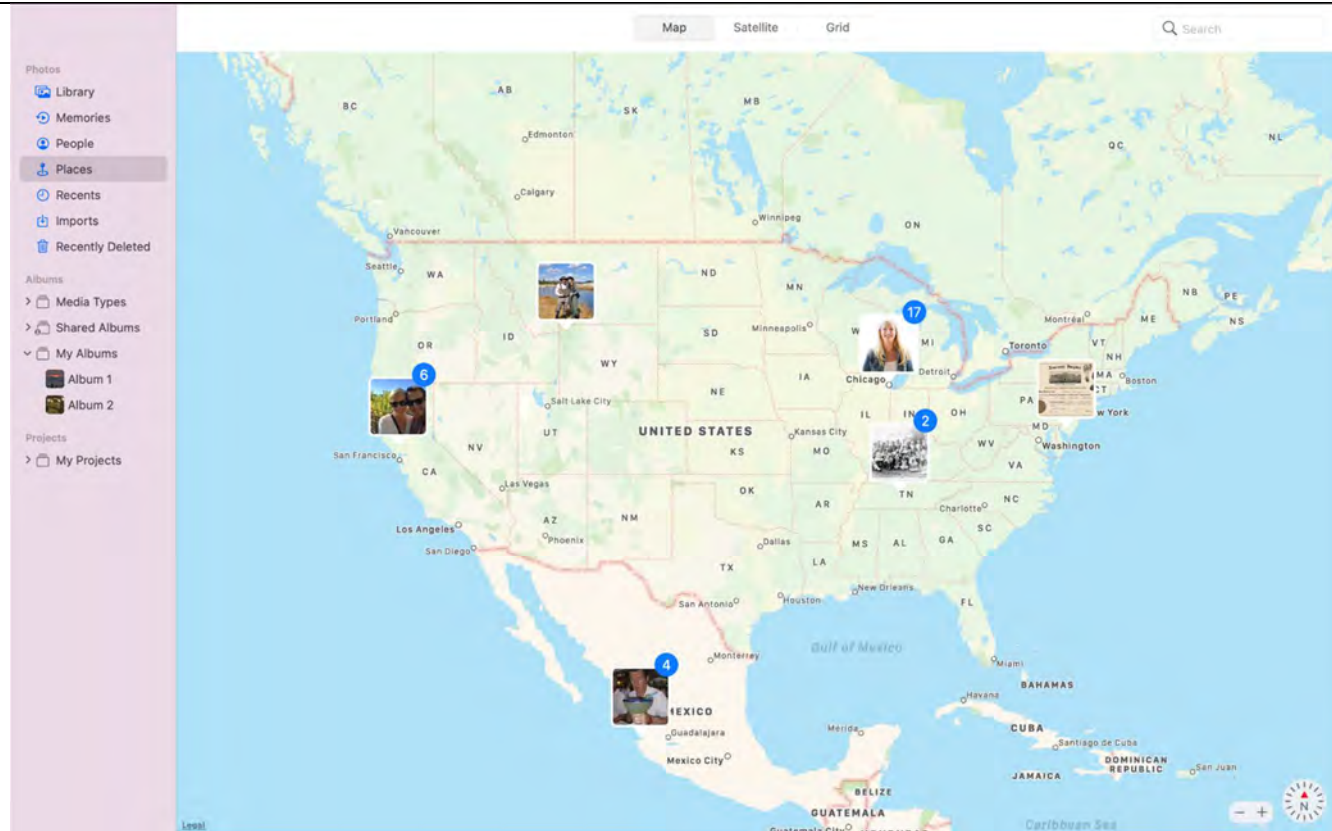
**U.S. Patent No. 10,423,658 – Infringement Claim Chart**

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>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 Photos app interface. On the left, a sidebar contains several categories: 'Photos', 'Library', 'Memories', 'People', 'Places' (highlighted with a red box and a red arrow), 'Recents', 'Imports', and 'Recently Deleted'. Below these are 'Albums' (Media Types, Shared Albums, My Albums) and 'Projects' (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. The top of the app shows navigation options like 'Years', 'Months', 'Days', and 'All Photos'.</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:

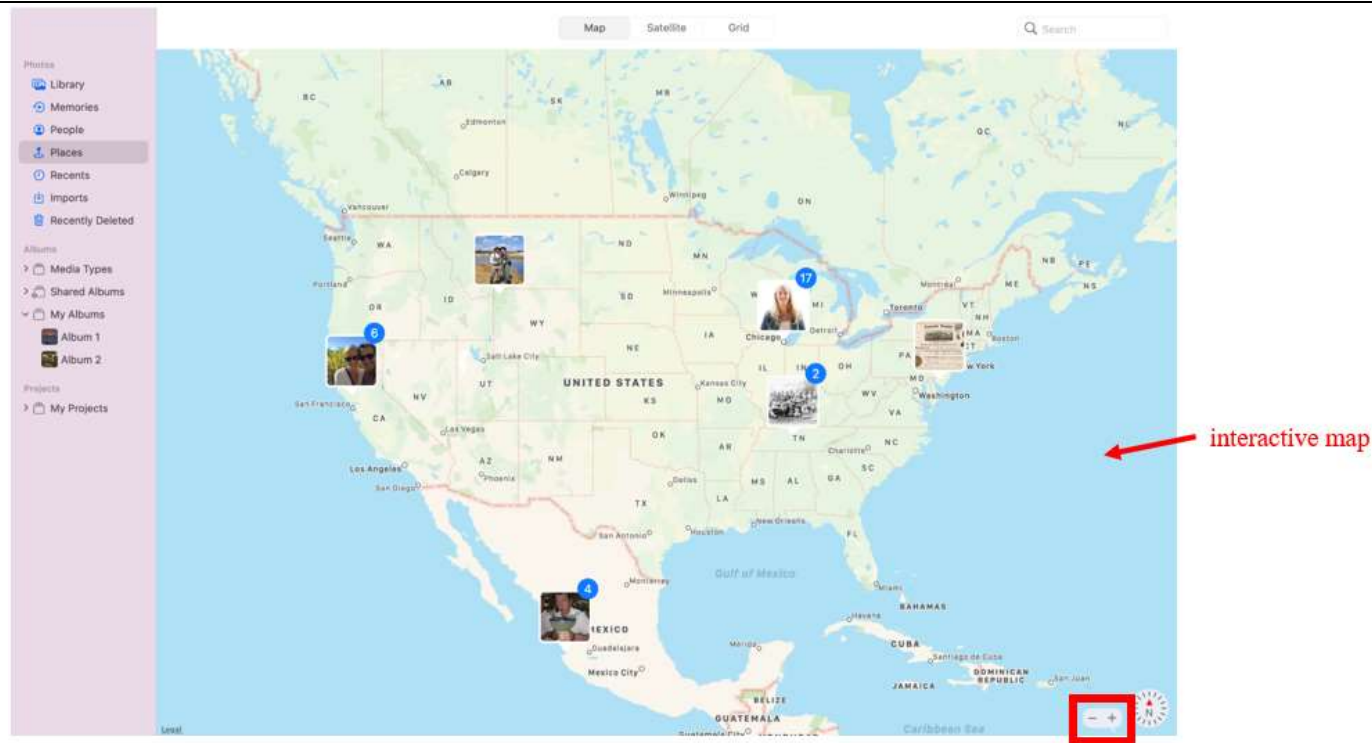


**1[b][i]** (i) a representation of an interactive map;

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

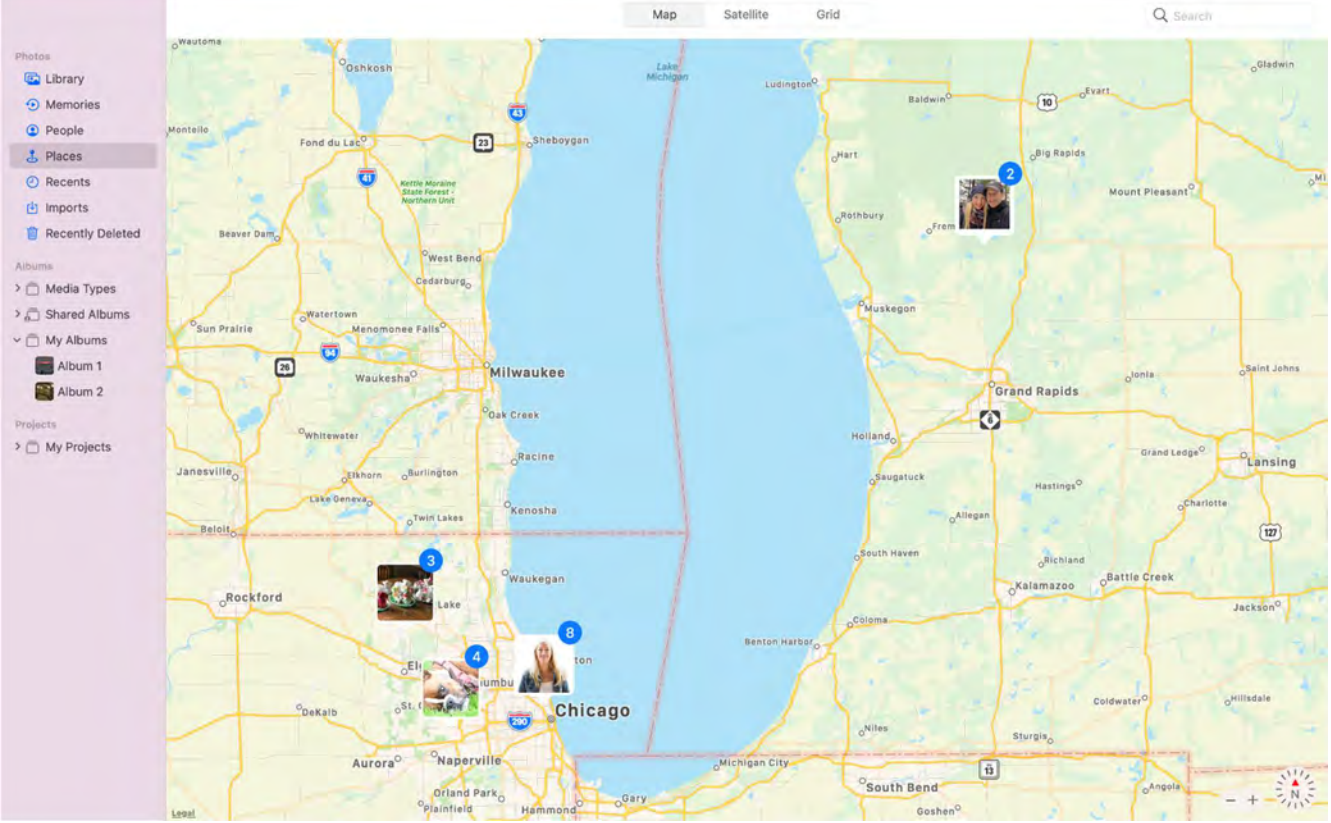


Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Apple macOS

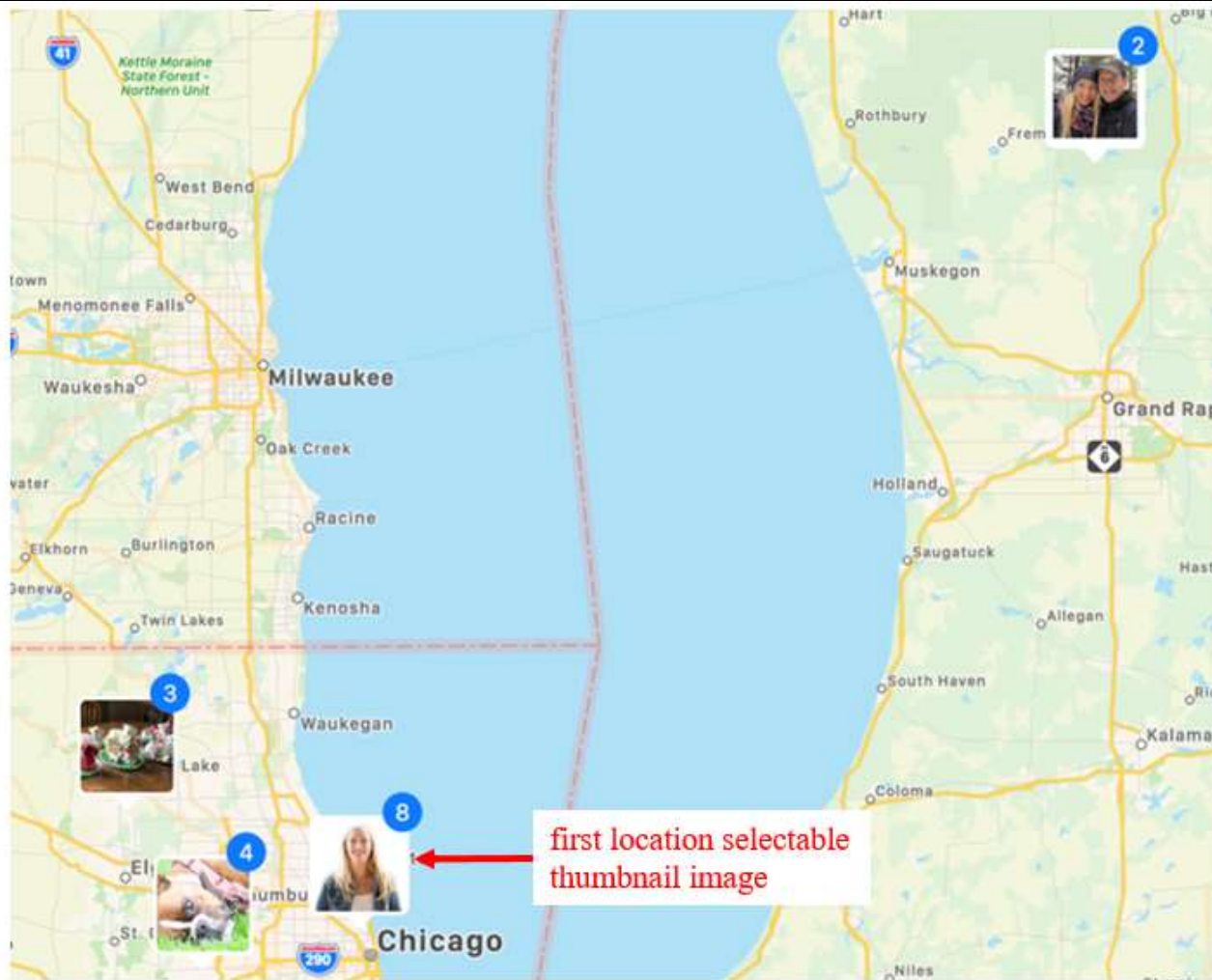


The map is interactive at least because macOS can zoom in or out, as shown below.

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,

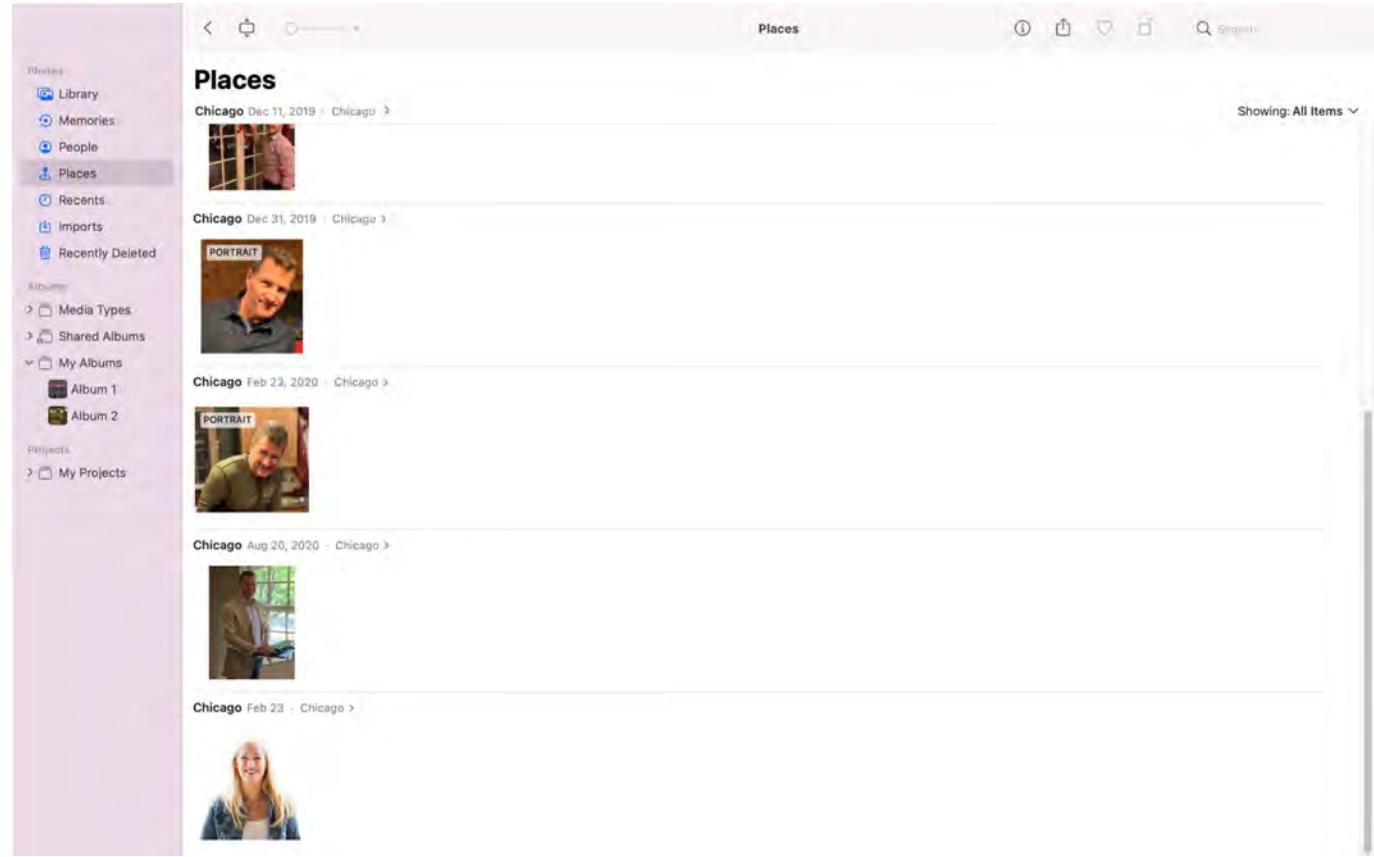


The first location is associated with the geographic coordinates of a first geotag. In this example, the first location selection thumbnail is associated with Chicago, Illinois. *See also* information for limitation 1[b][ii][A].

**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.

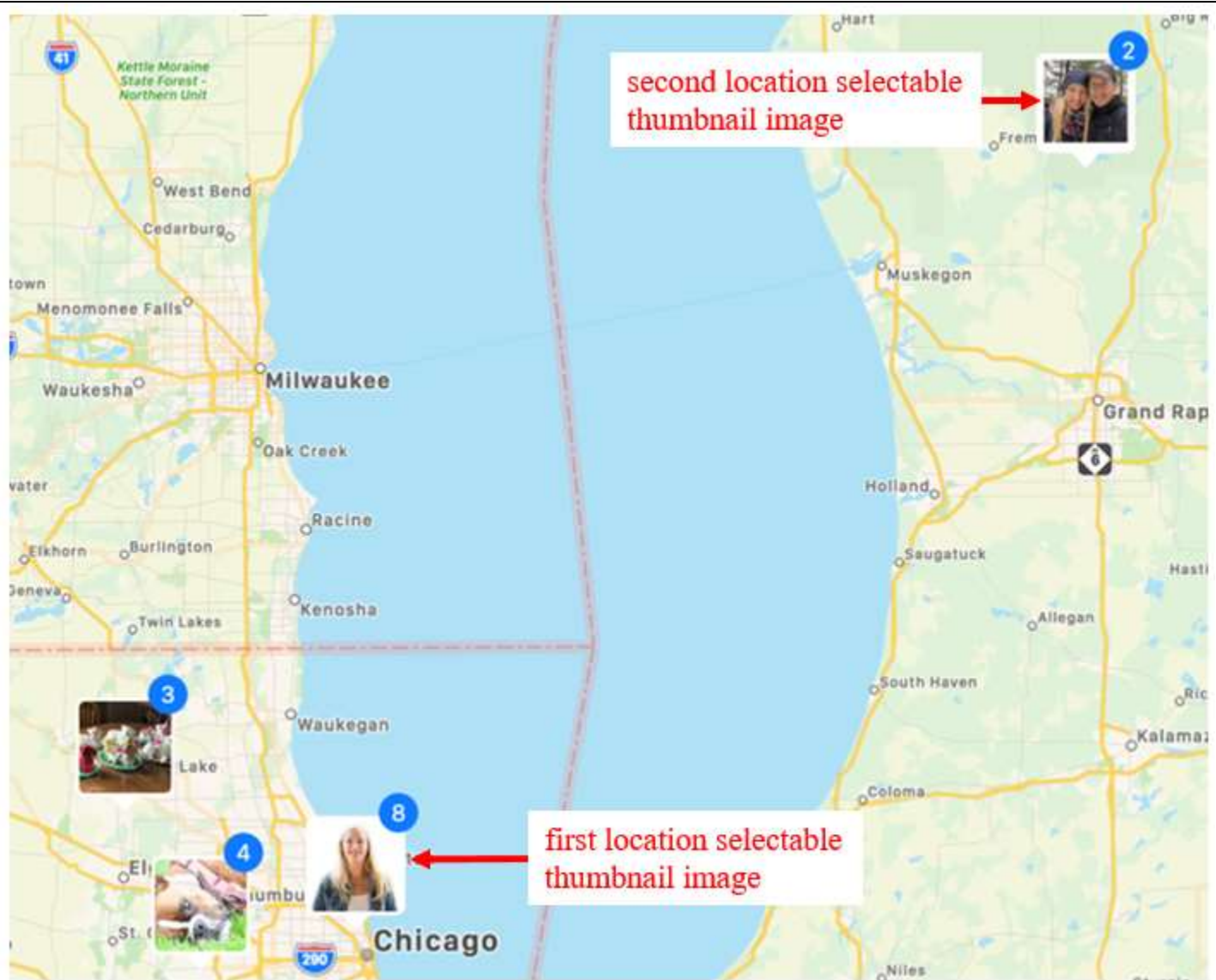
image including a first number that corresponds to the number of digital photographs and videos in the first set of digital photographs and videos;



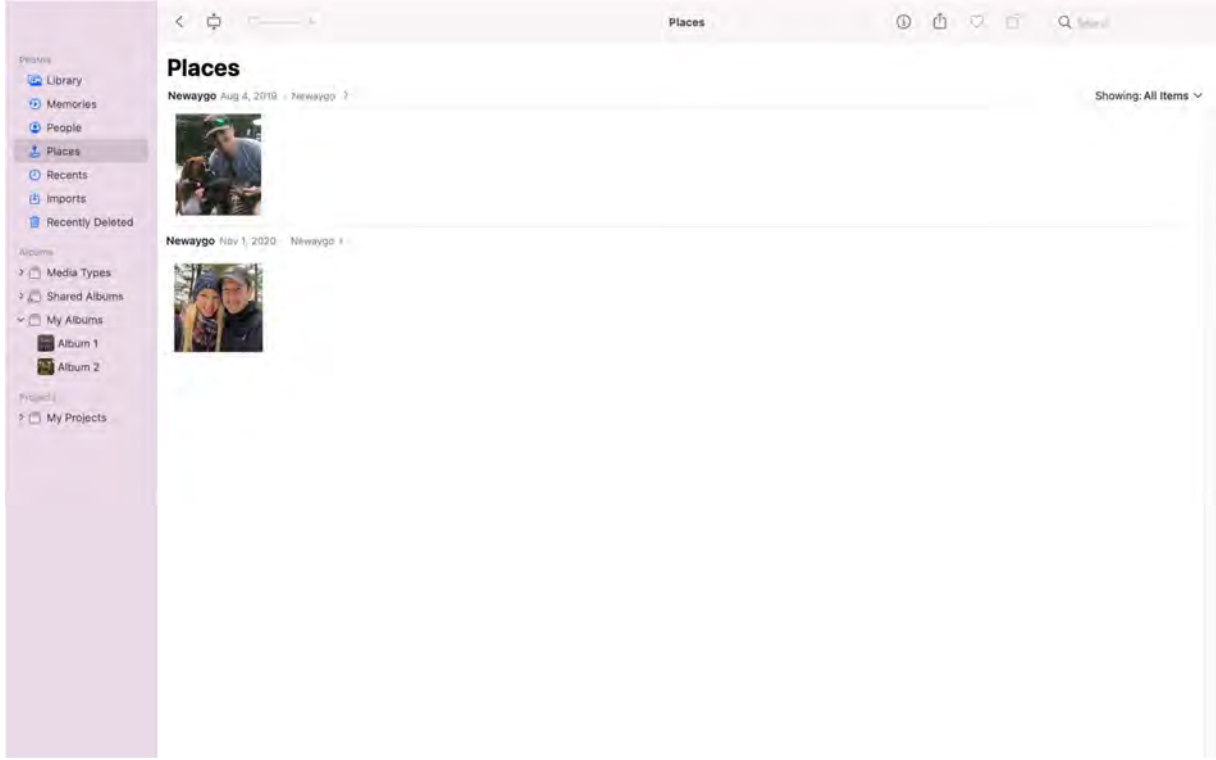
**1[b][iv]** (iv) a second location selectable thumbnail image at a second location on the interactive map, the second location being associated with the geographic


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,



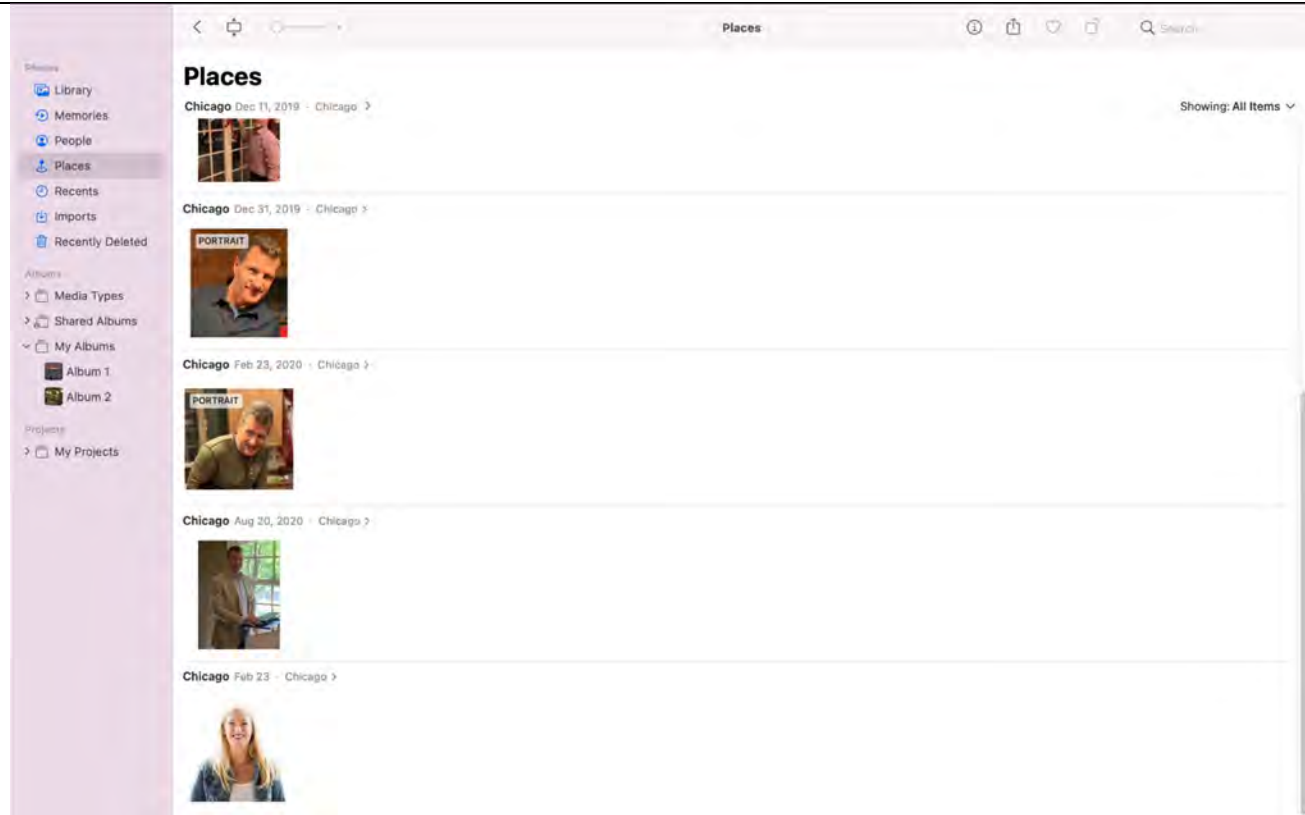
The second location is associated with the geographic coordinates of a second geotag. *See also* information for 1[b][iv][A].

<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>

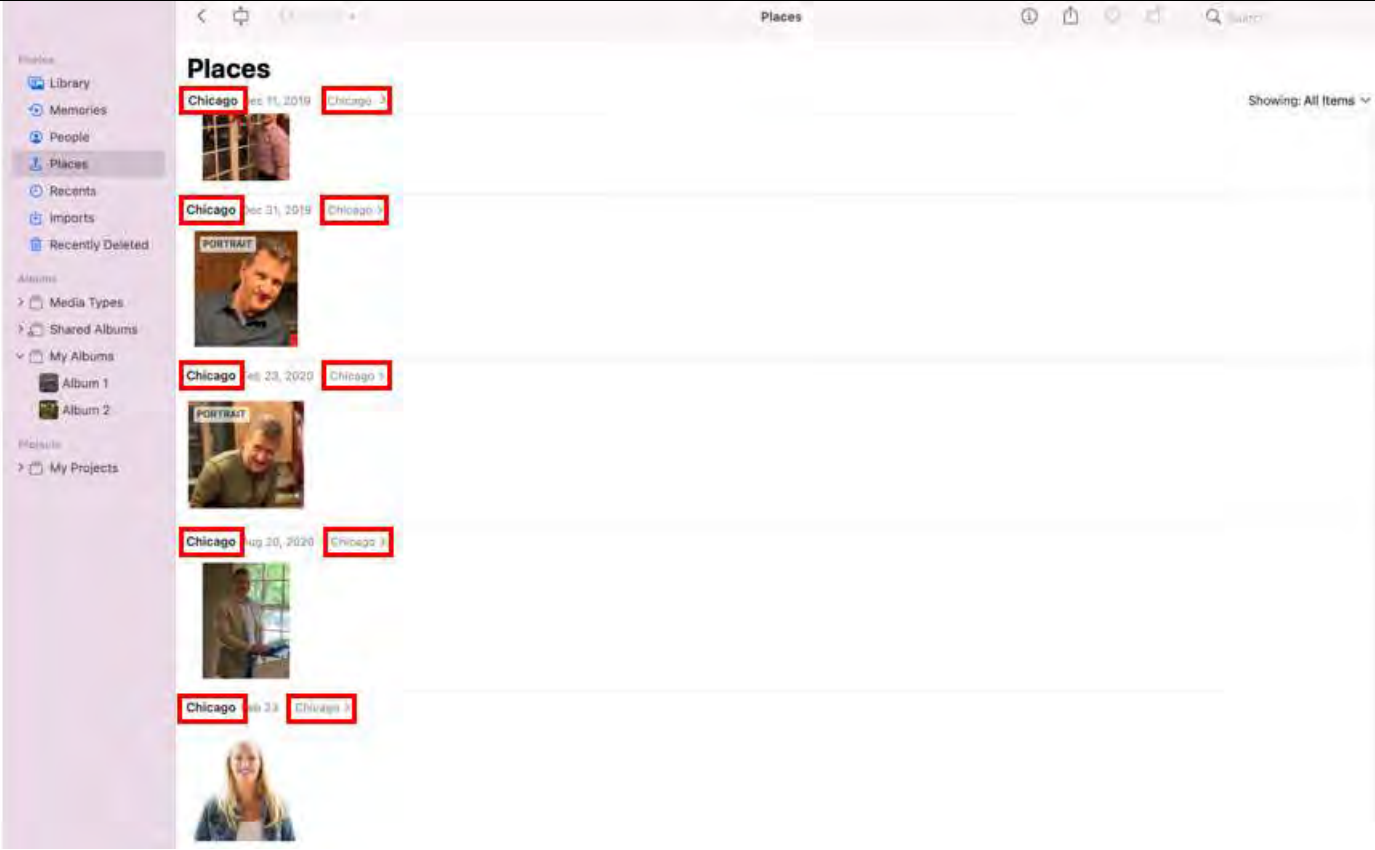


view including displaying

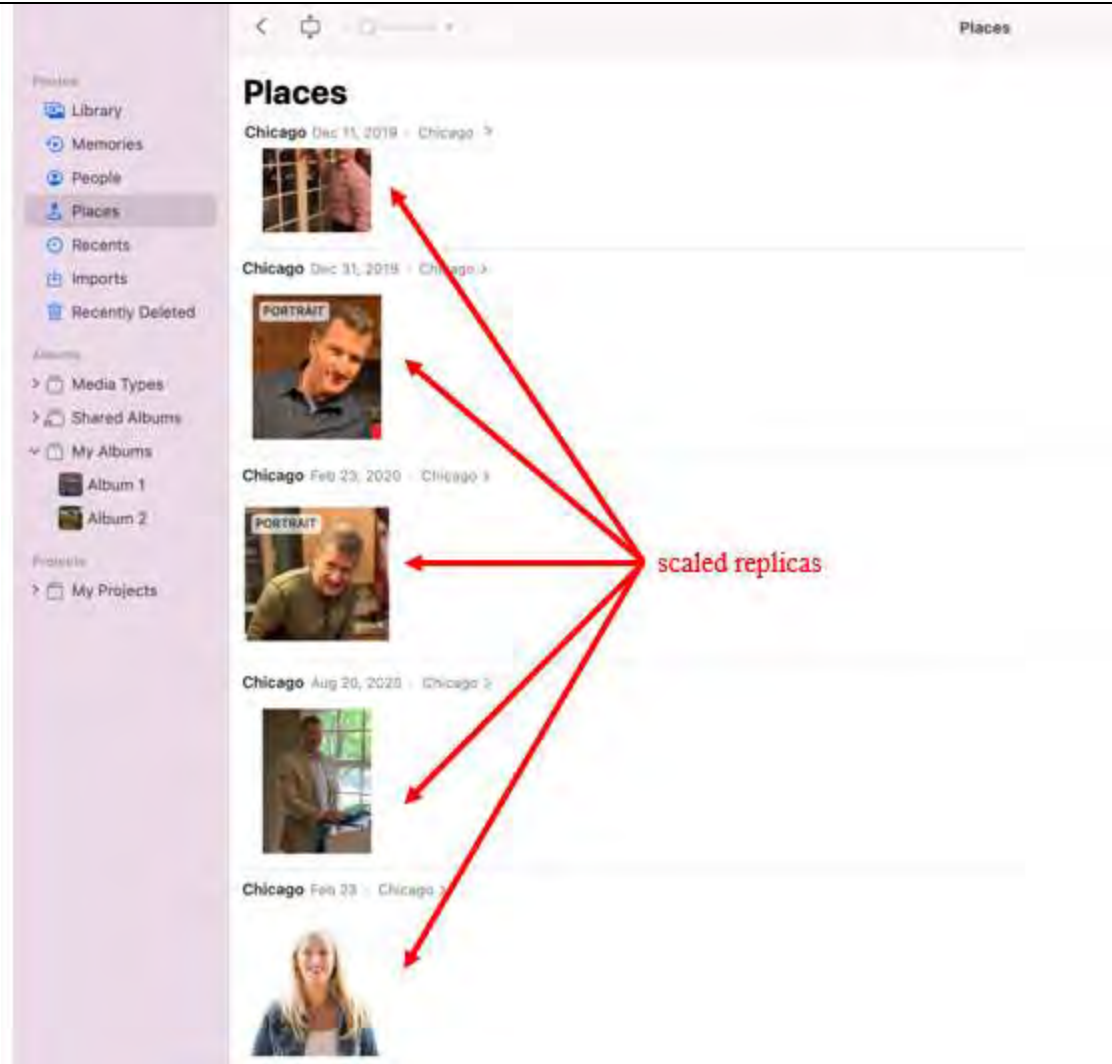


1[c][i] (i) a first location name associated with the first geotag and

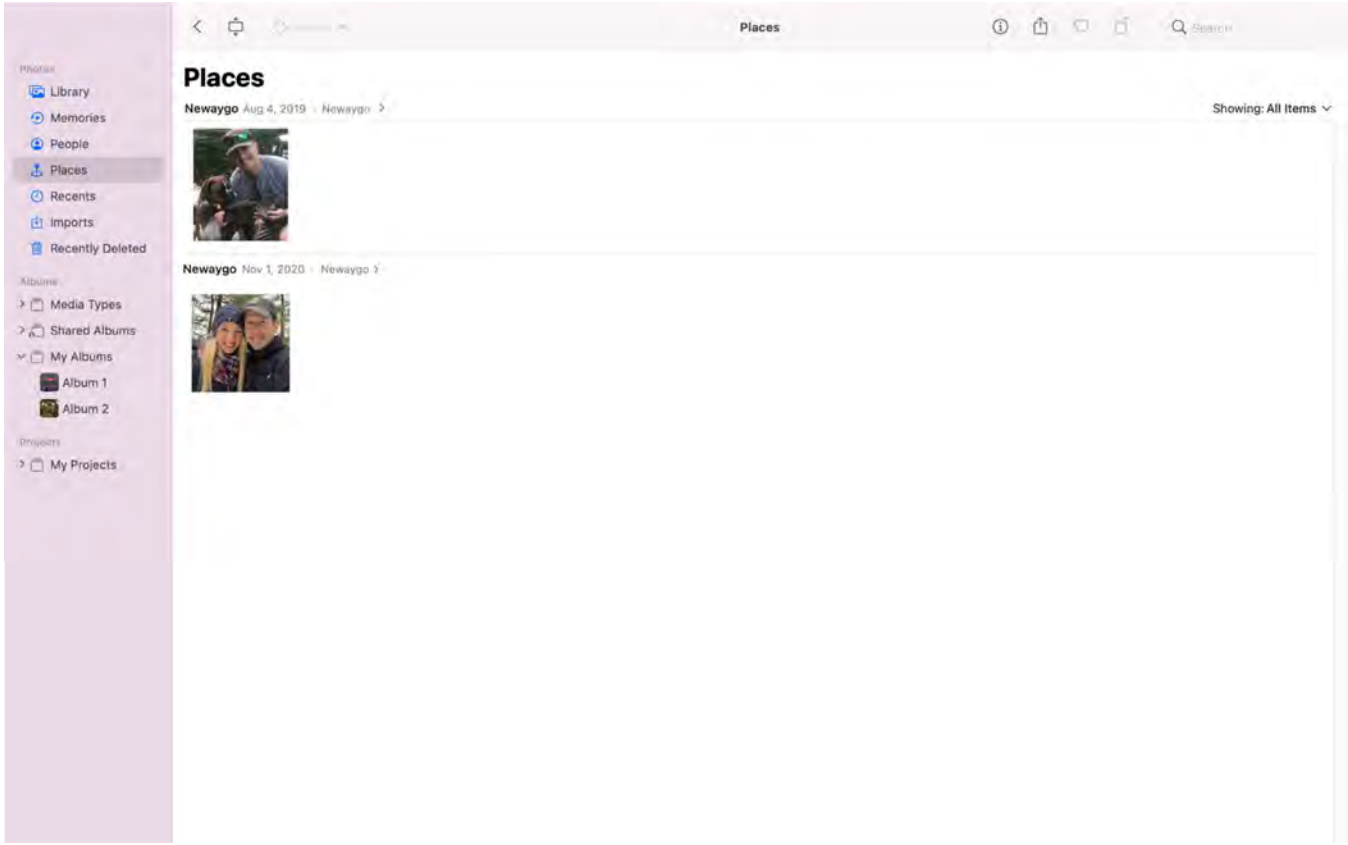
The first location view includes a first location name (in this example, Chicago) associated with the first geotag.

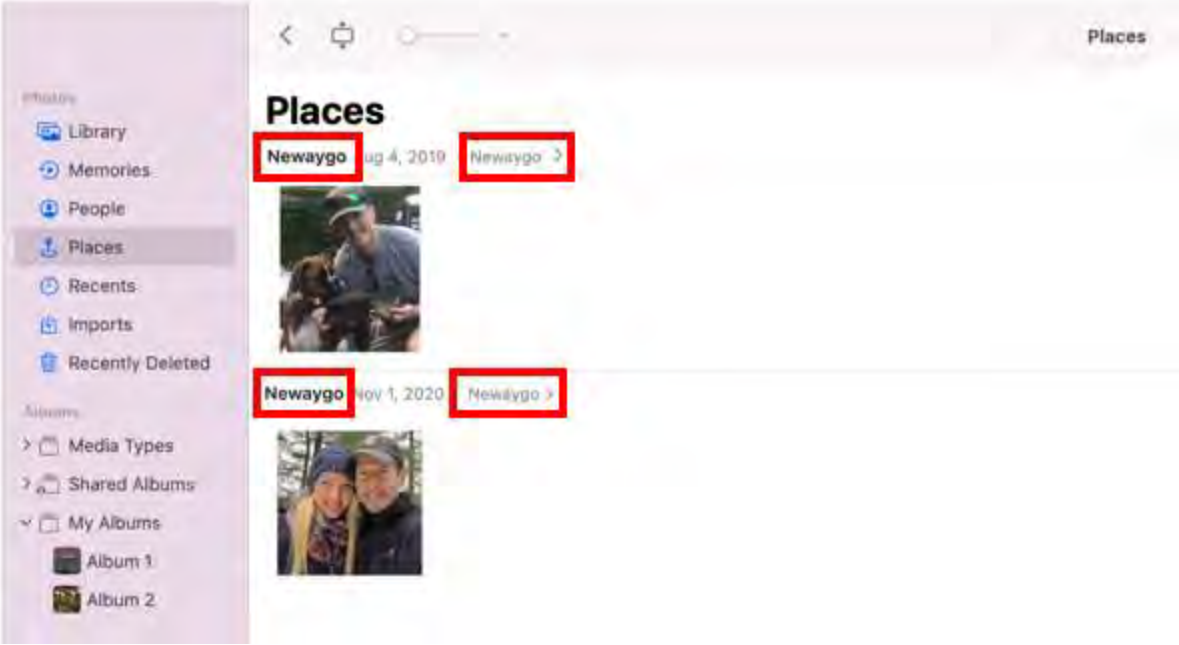
	
<p><b>1[c][ii]</b> ii) a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos, the</p>	<p>The first location view includes a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos.</p>

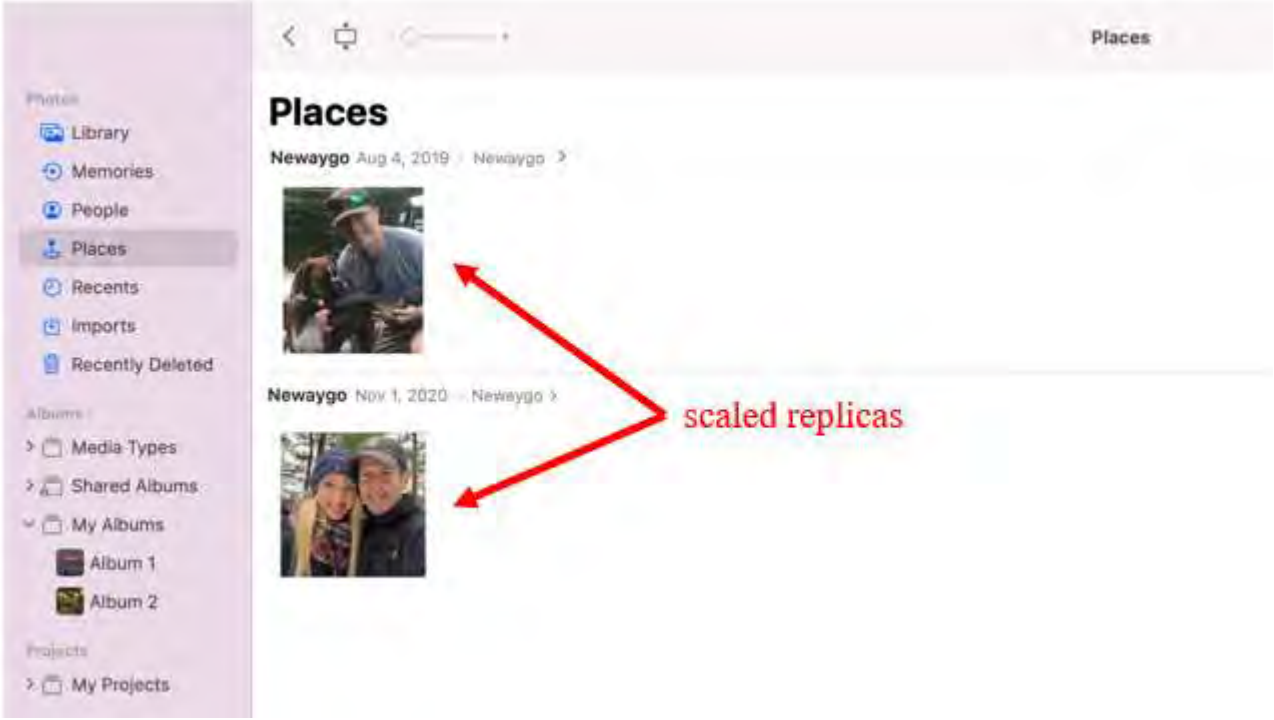
displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos not being overlaid on the interactive map; and



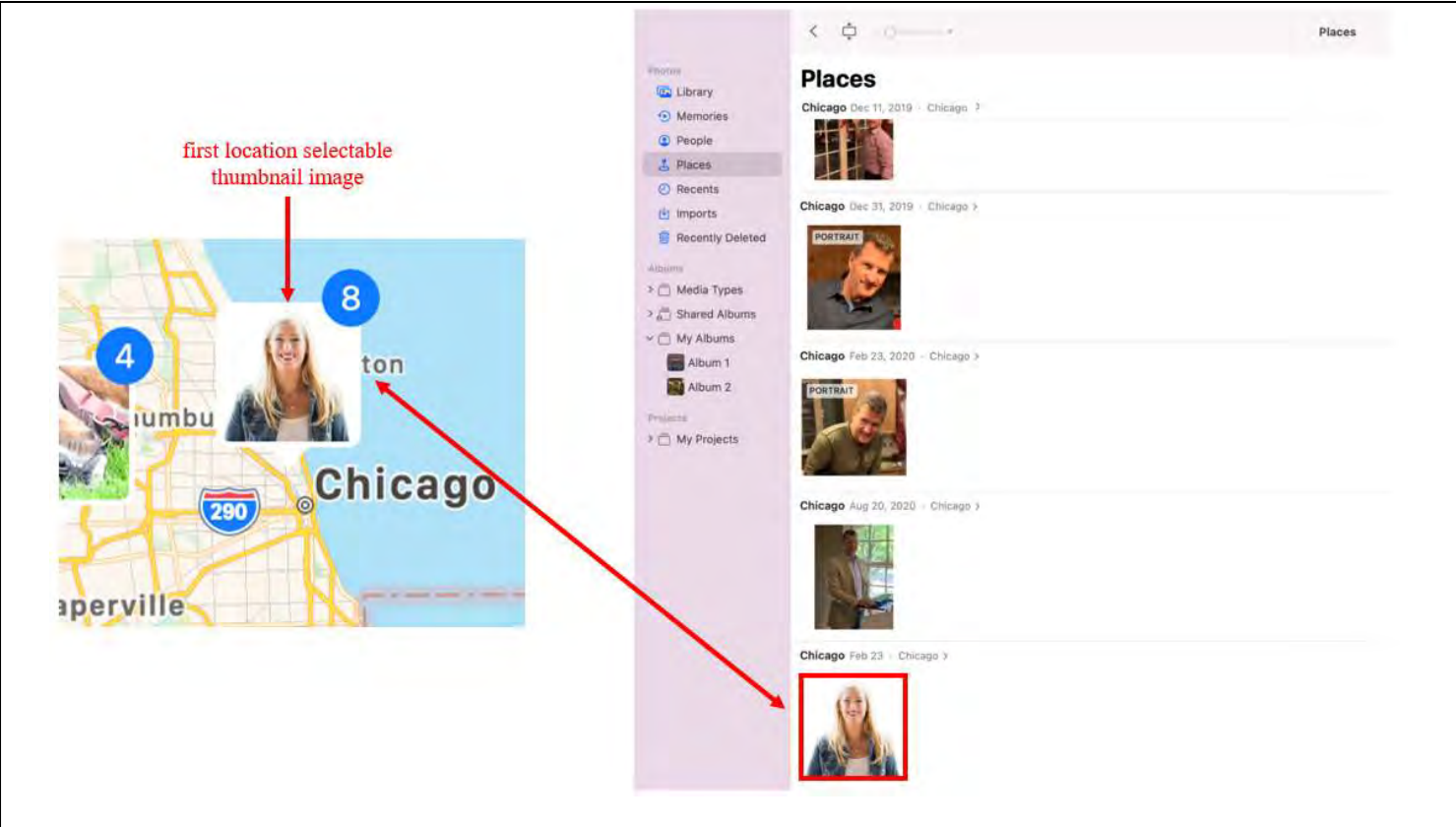
*See also* information for limitation 3[a]. As shown above, the displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. *See* limitation 1[b][i].

<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>

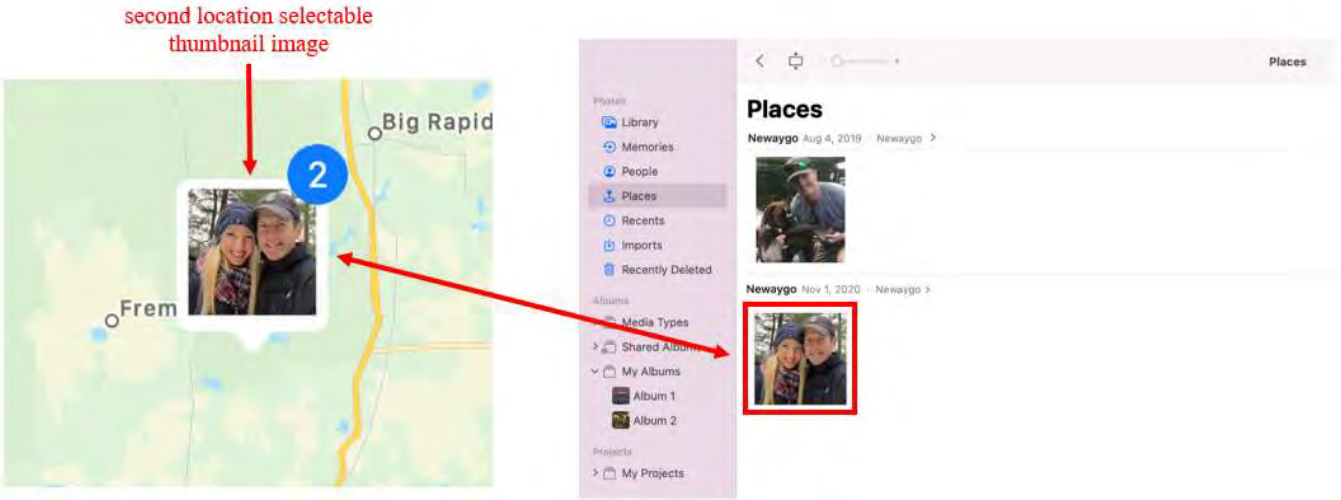
<p>second set of digital photographs and videos not being overlaid on the interactive map.</p>	 <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> limitation 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



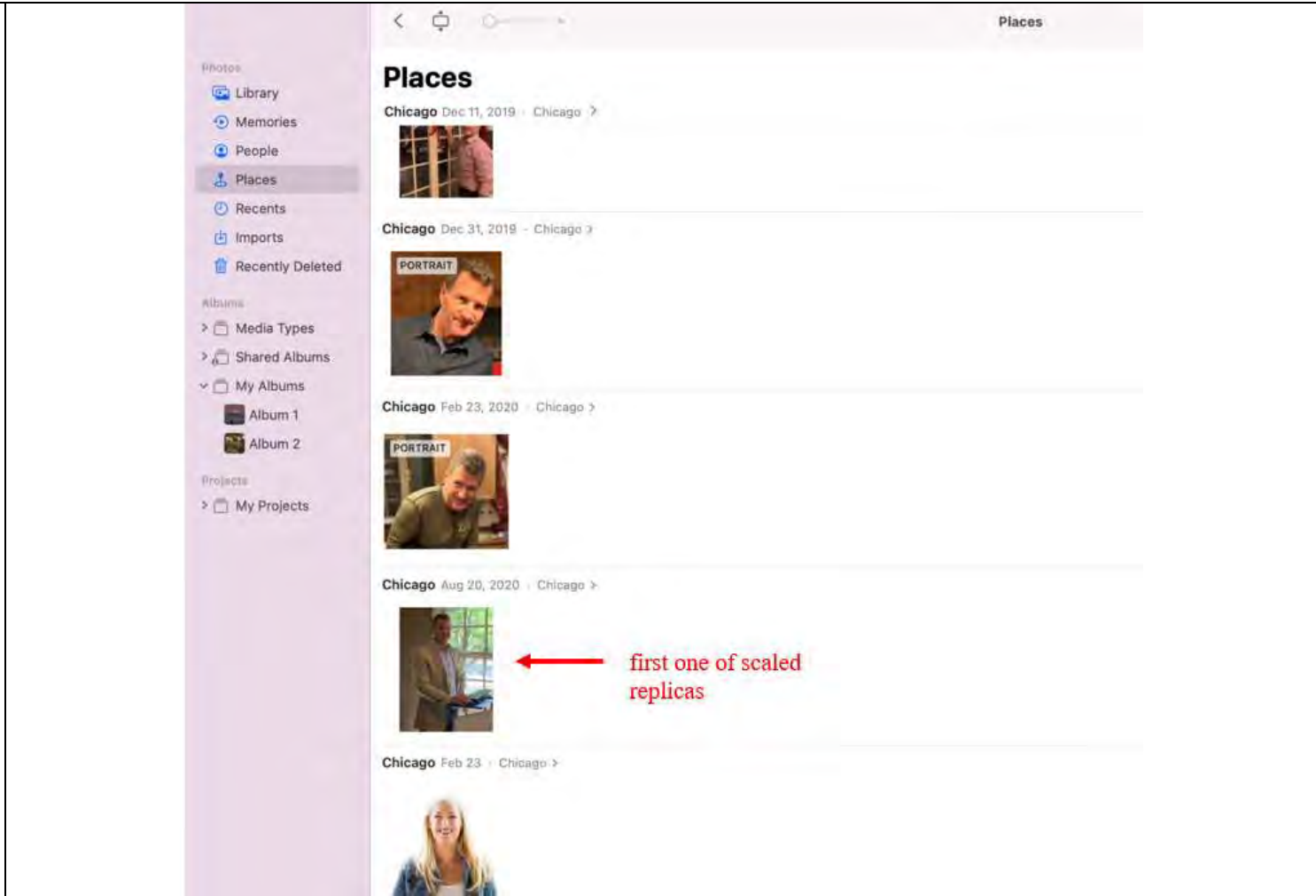
**2[b]** and wherein the second location selectable thumbnail image includes a scaled representation of at least one of the digital photographs in the second set of


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]).

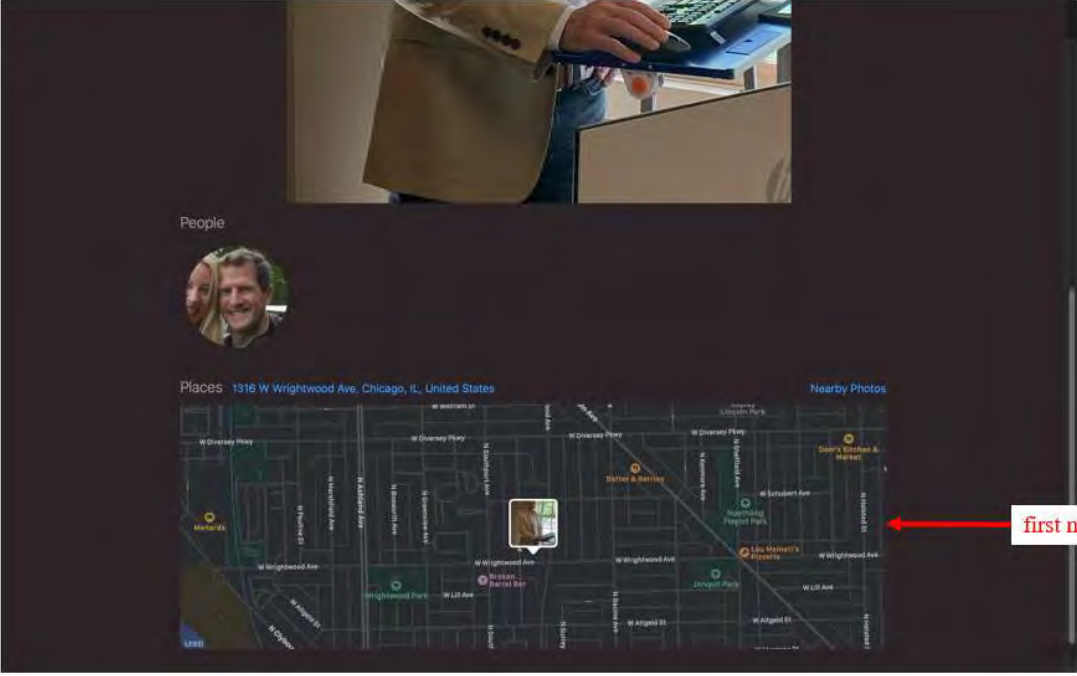
<p>digital photographs.</p>	 <p>The image shows a screenshot of the macOS Photos app. On the left, a map view displays a location with a photo thumbnail. A red arrow points to the thumbnail with the text "second location selectable thumbnail image". A blue circle with the number "2" is overlaid on the 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>



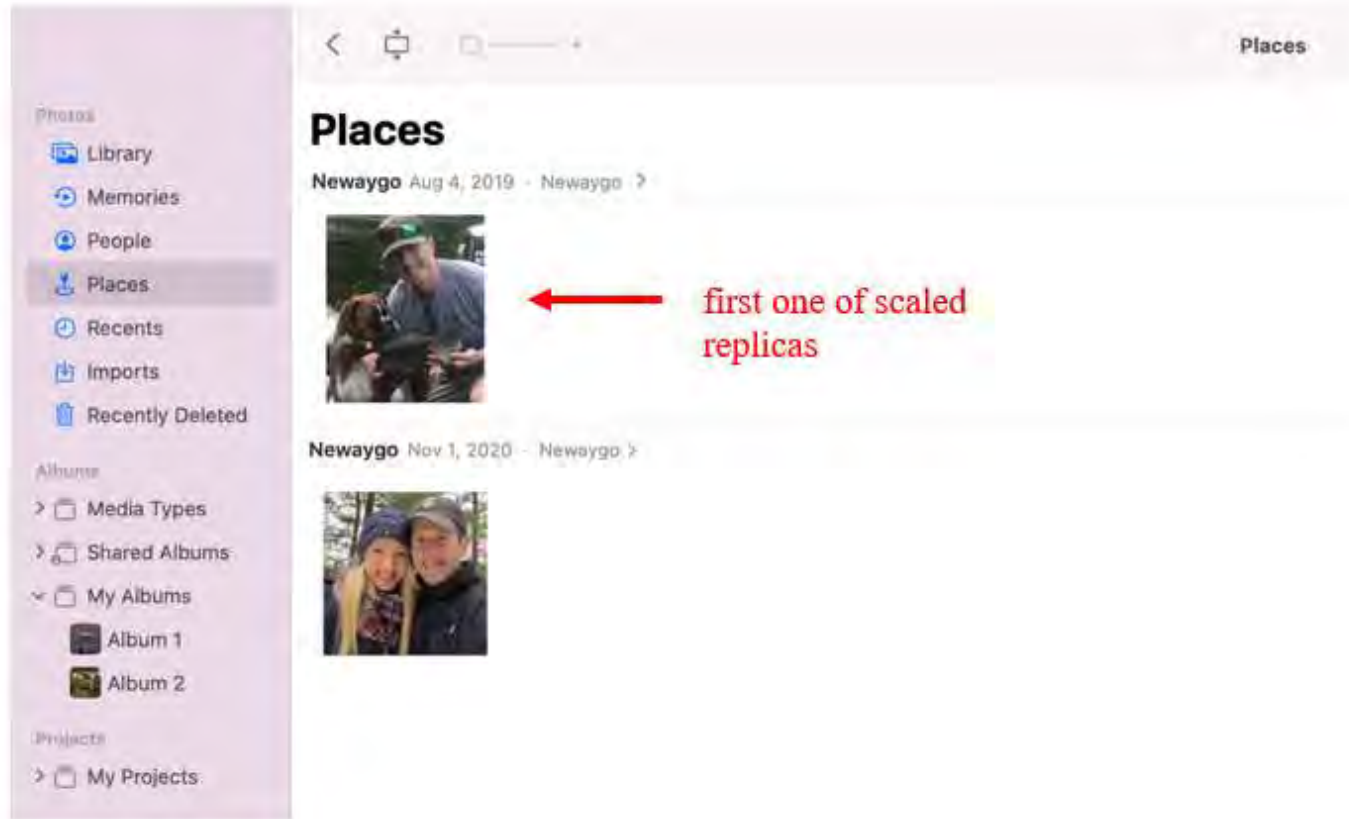
first location  
view and




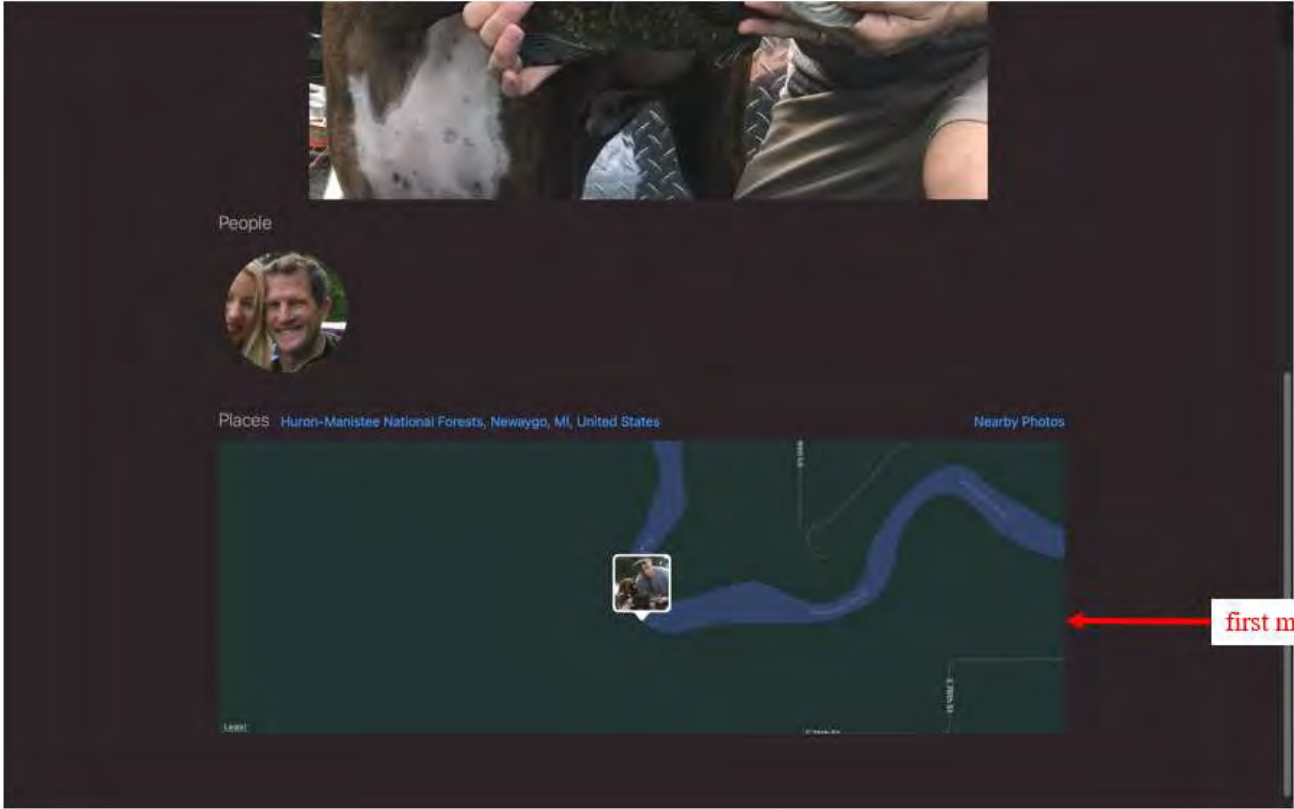
	 <p>A photograph of a man in a light-colored blazer standing at a desk with a computer. A red arrow points to the right side of the image, labeled "first digital photograph".</p>
<p><b>3 b </b> a first map image indicating the geographic coordinates of the first geotag.</p>	<p>macOS displays a first map 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 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>

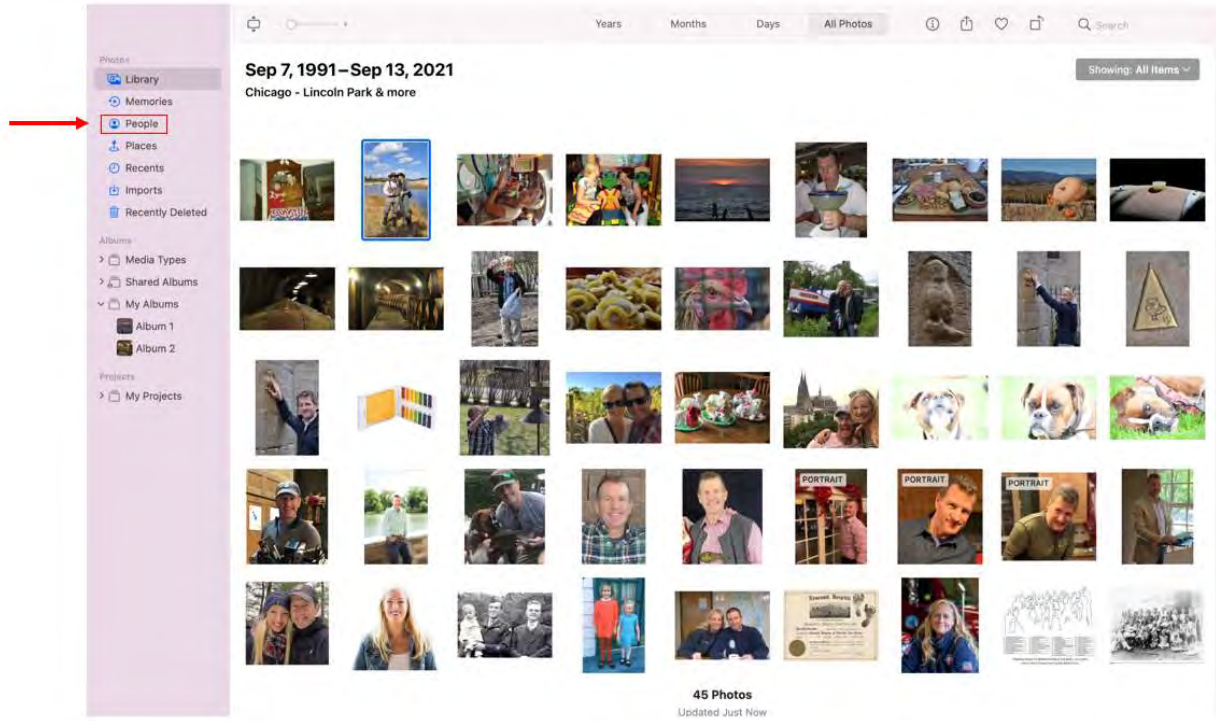
digital photograph associated with the first scaled replica in the second location view and



	 <p data-bbox="1591 545 1843 578">first digital photograph</p>
<p data-bbox="201 1003 394 1253"><b>4[b]</b> a second map image indicating the geographic coordinates of the second geotag.</p>	<p data-bbox="447 1003 1829 1073">macOS displays a second map image indicating the geographic coordinates of the second geotag below first digital photograph, as shown below.</p>

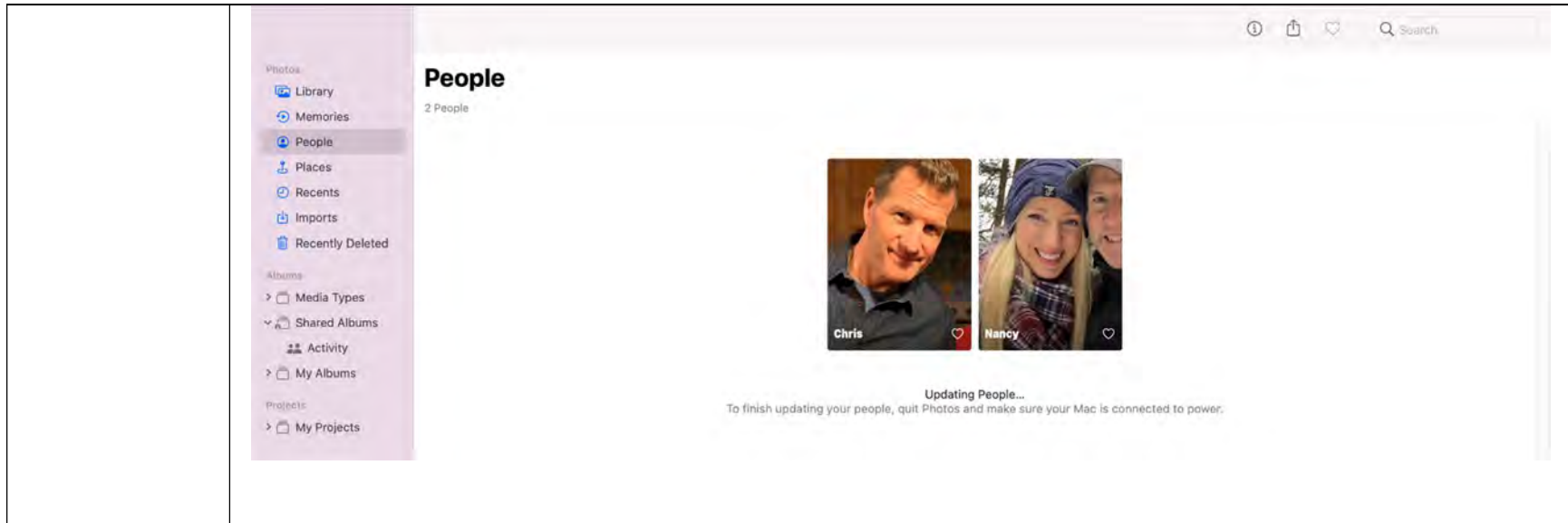
	
<p><b>5[pre]</b> The computer-implemented method of claim 1,</p>	<p>See information for claim 1.</p>
<p><b>5[a]</b> wherein the plurality of selectable elements further includes a</p>	<p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) includes a people selectable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

people selectable element,



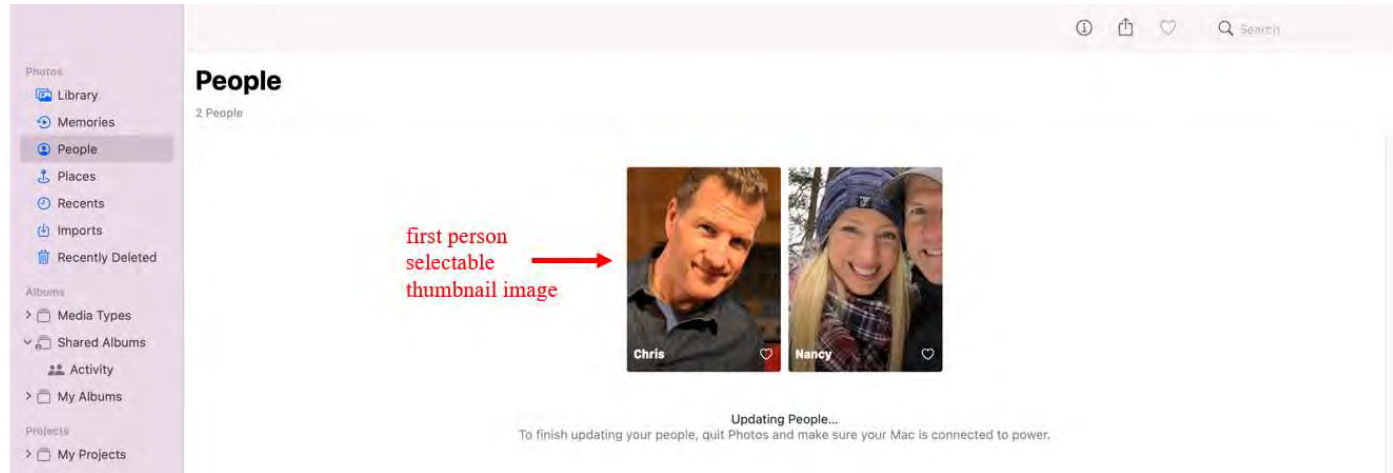
**5[b]** the method further comprising responsive to a click or tap of the people selectable element, displaying a people view, the displaying the people view including displaying:

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



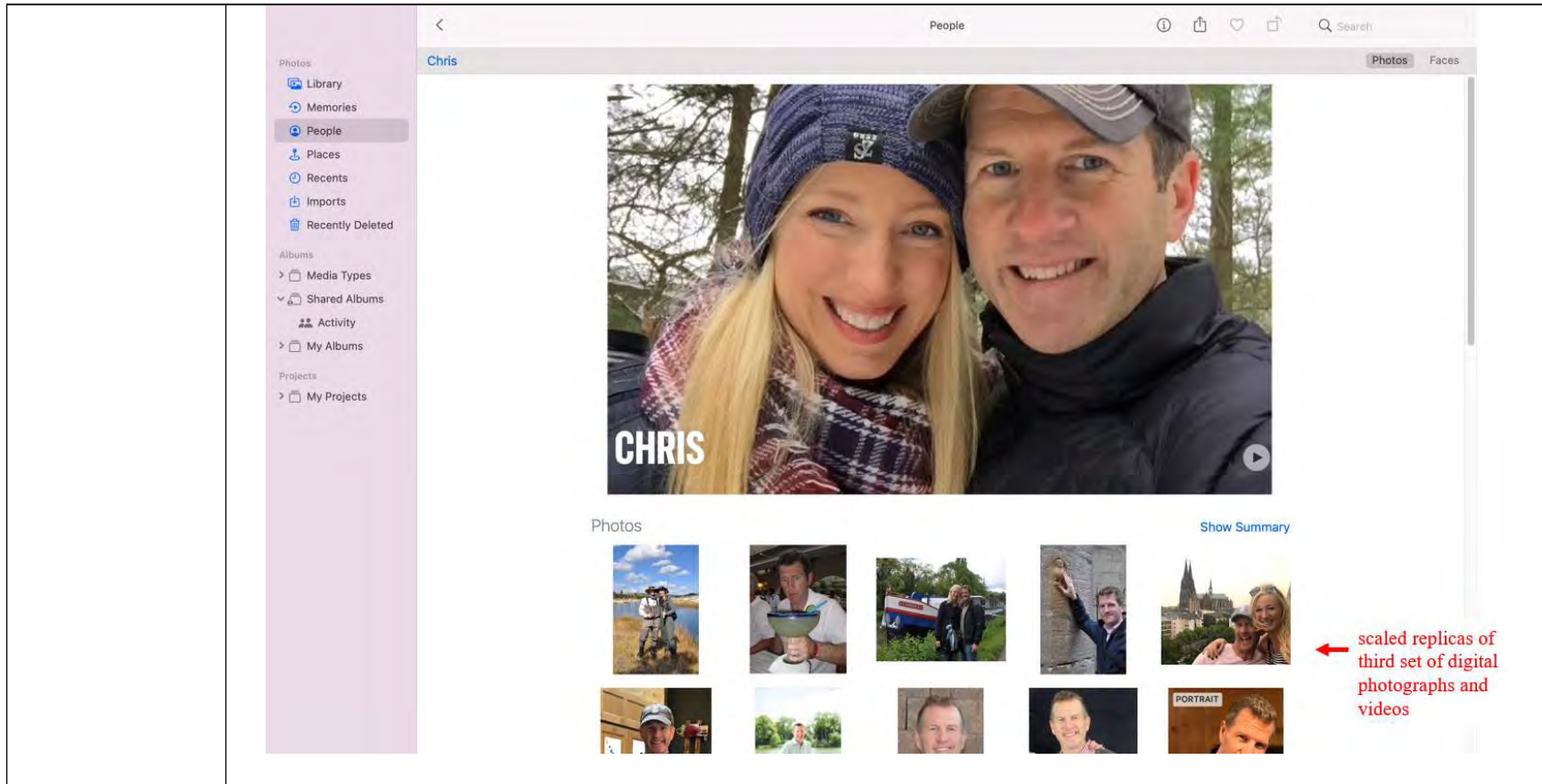
5[c] (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;

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



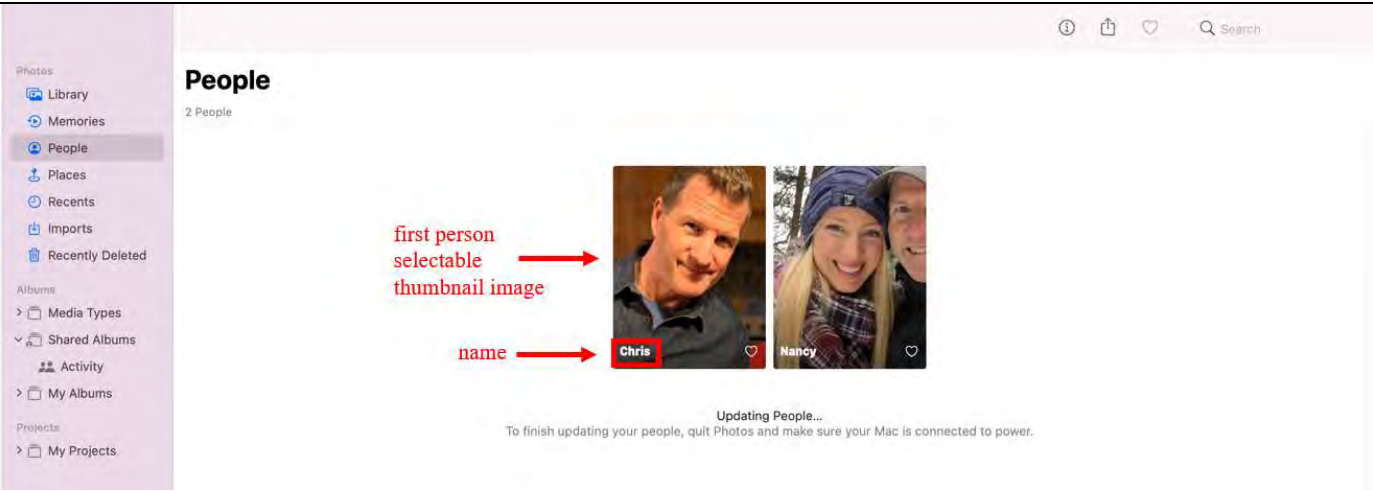
As shown, the first person selectable thumbnail image is associated with a third set of digital photographs and videos:



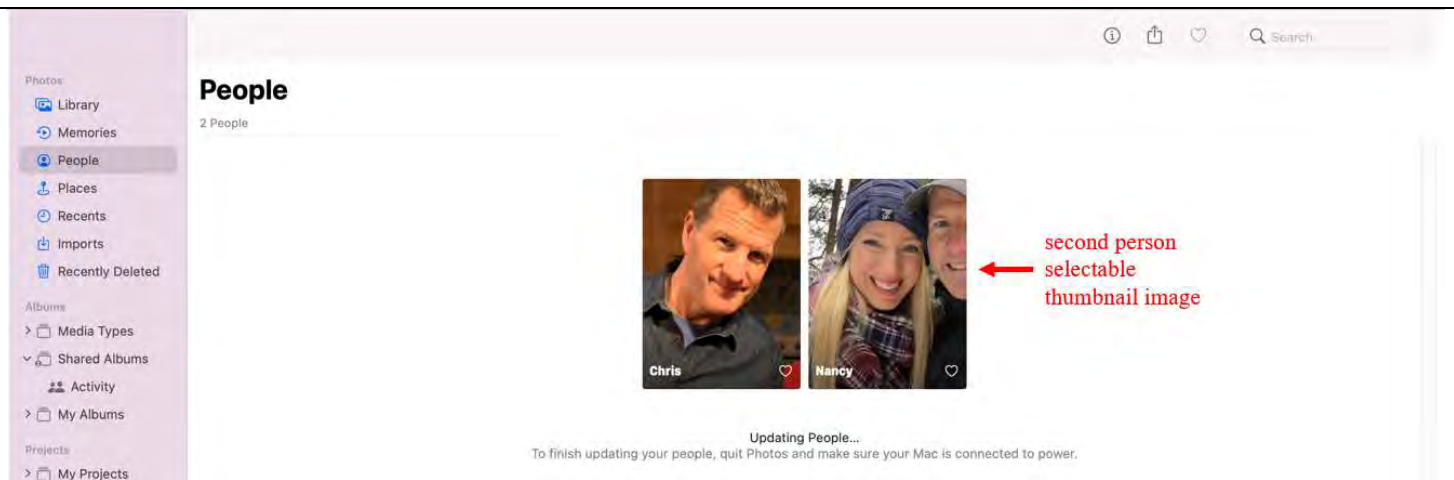


**5[d]** (ii) a name associated with the first person, the name associated with the first person being displayed adjacent to the first person selectable

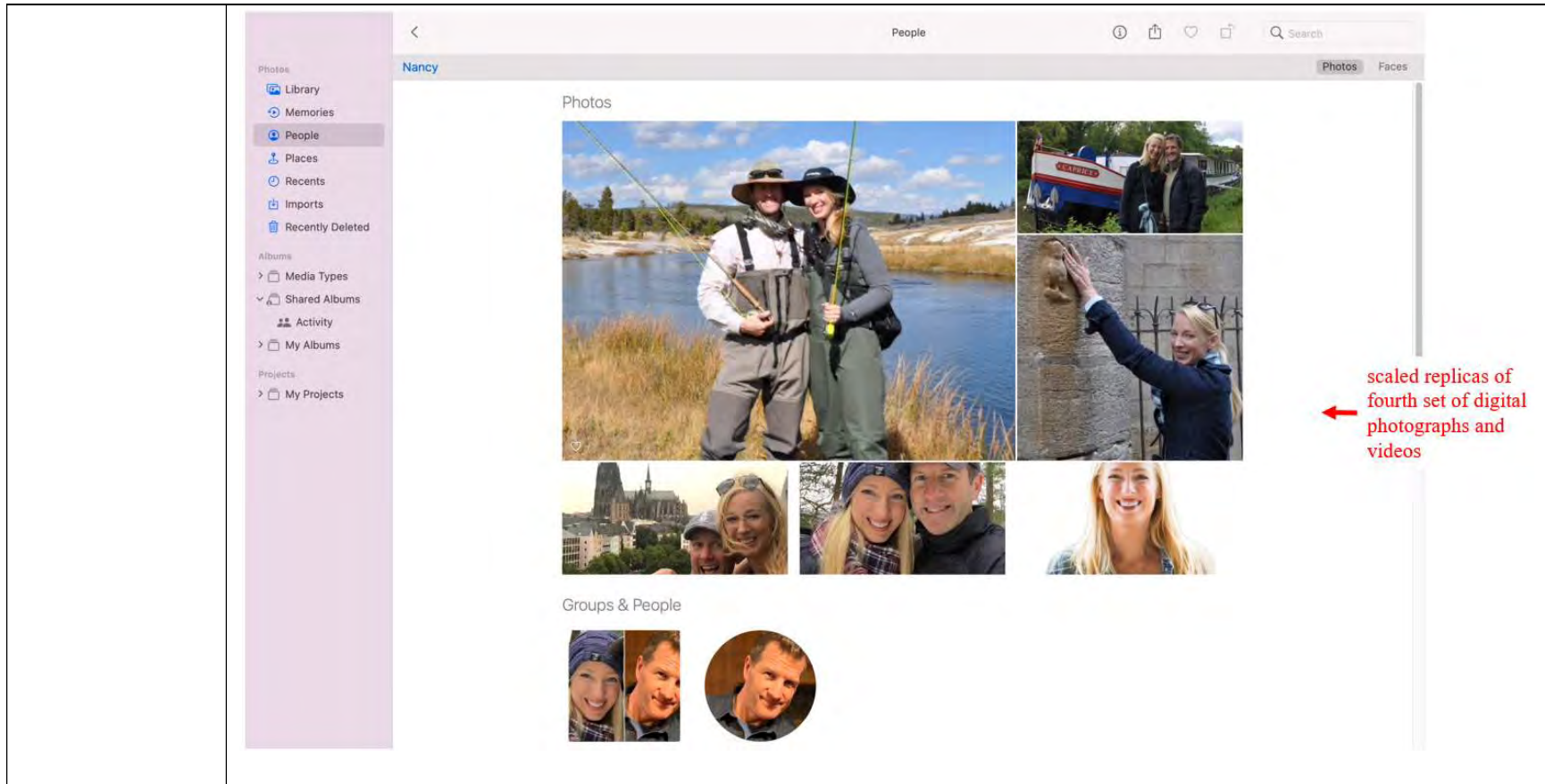
A name associated with the first person is displayed adjacent to the first person selectable thumbnail image, as shown below:

<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

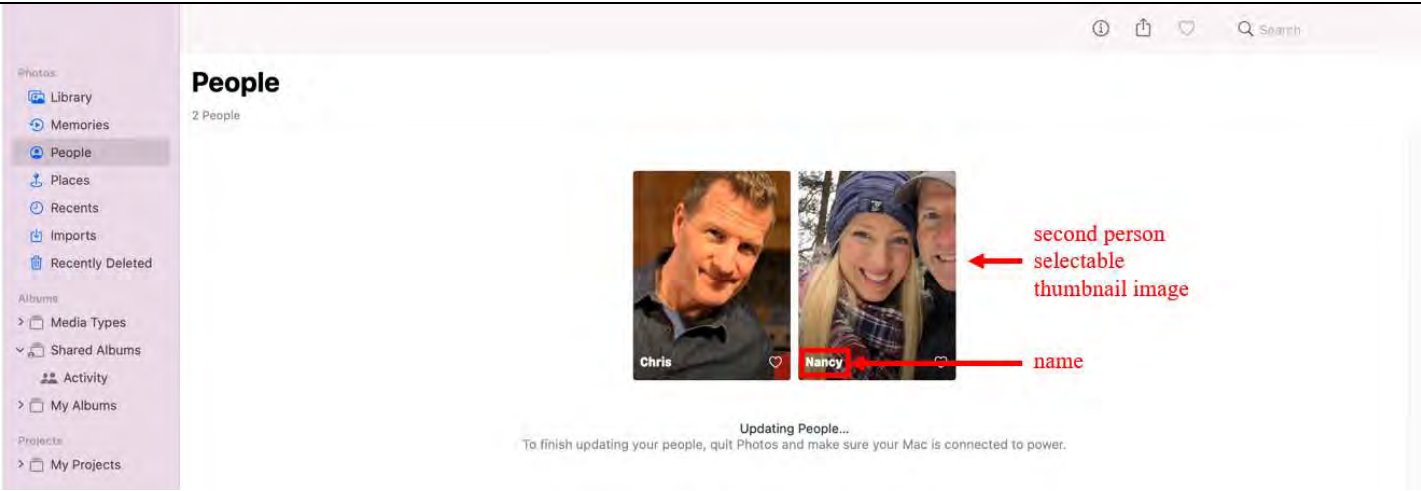


As shown, the second person selectable thumbnail image is associated with a fourth set of digital photographs and videos:

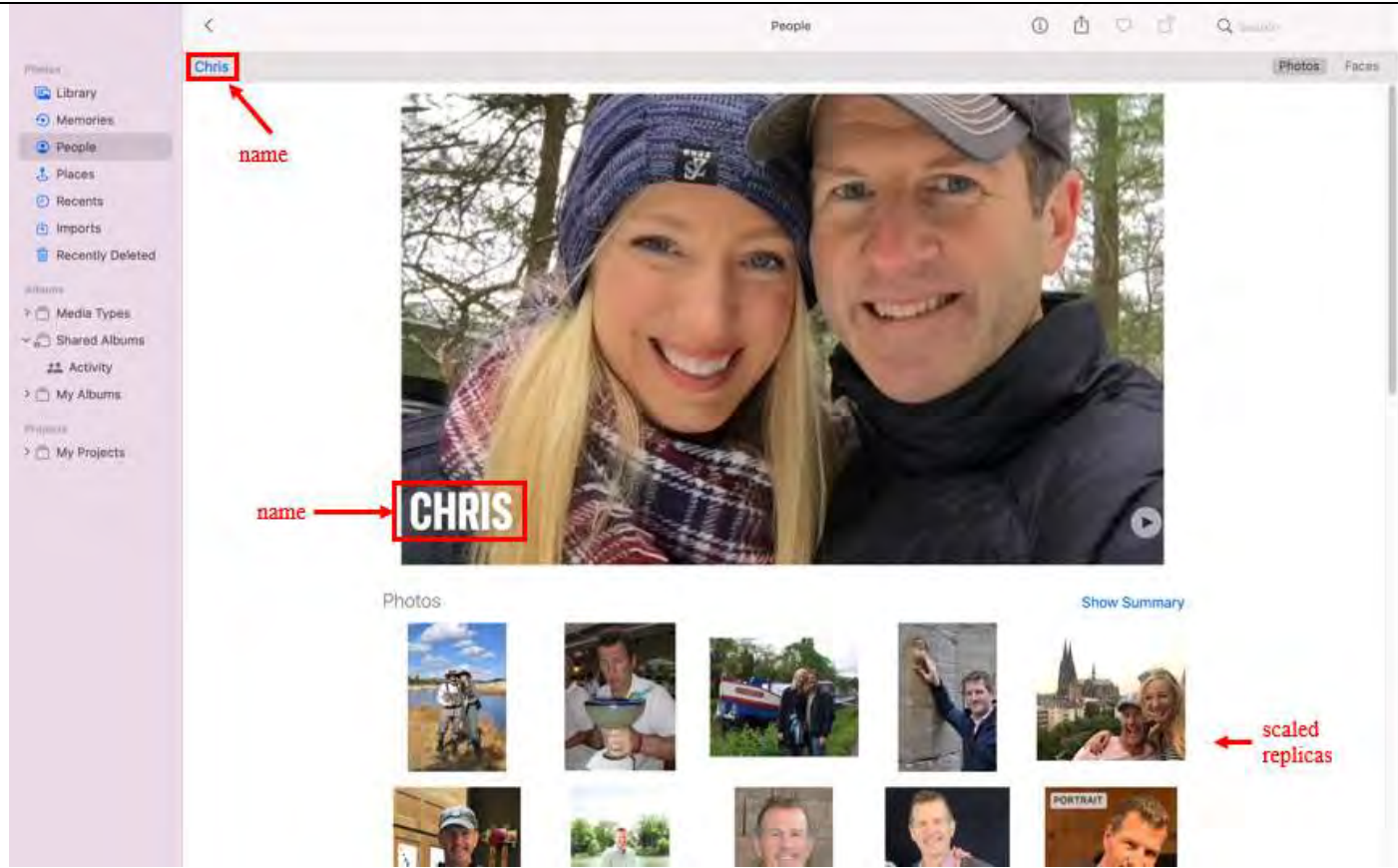


**5[f]** (iv) a name associated with the second person, the name associated with the second person being displayed adjacent to the second person selectable

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

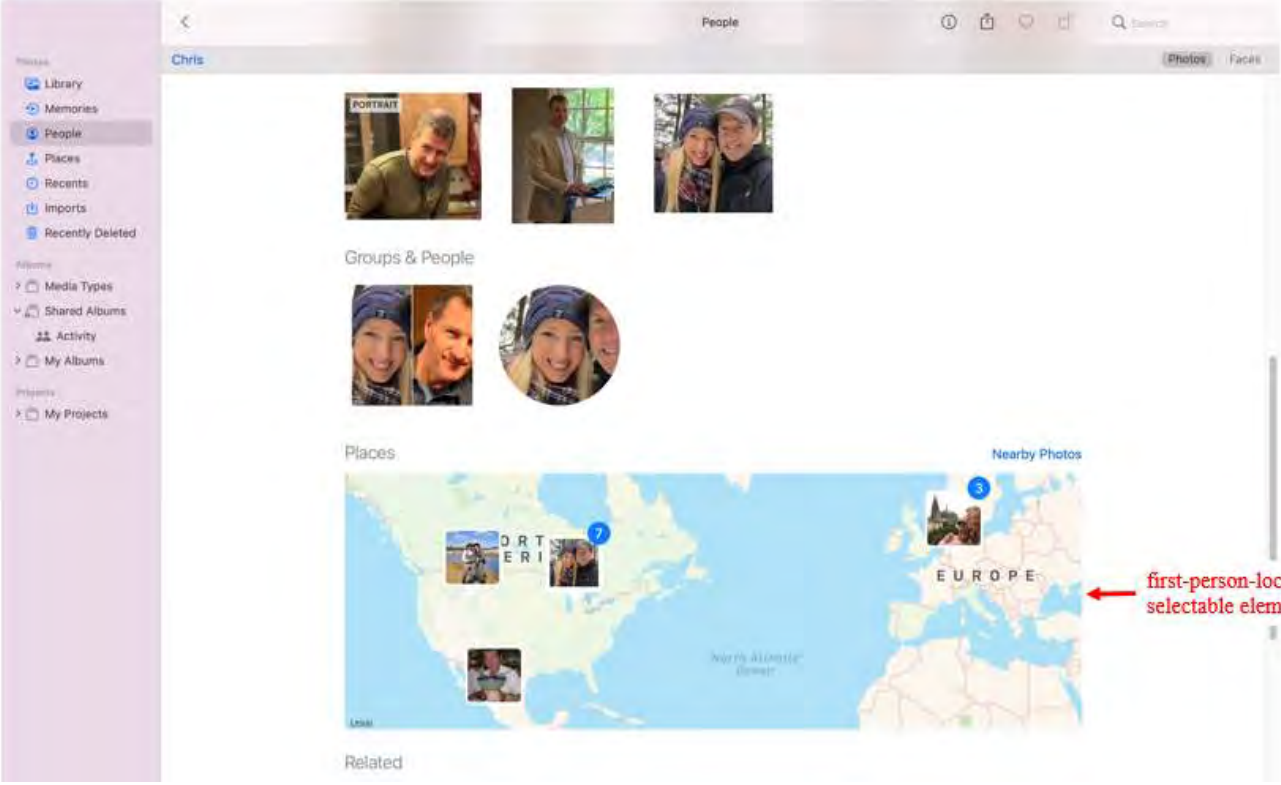
<p>thumbnail image.</p>	 <p>To the extent it is found that the name associated with the second person is not literally displayed adjacent to the second person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. 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.

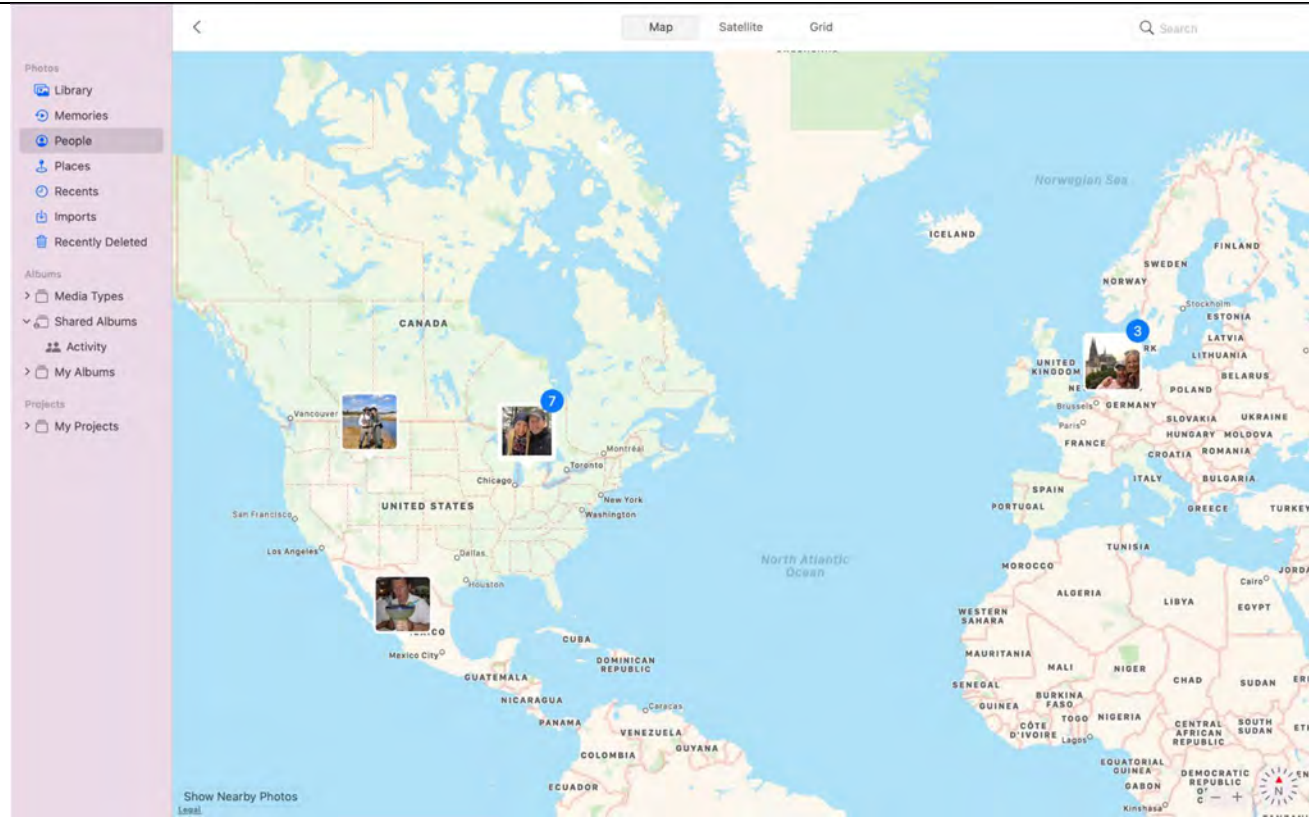


8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a

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>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.

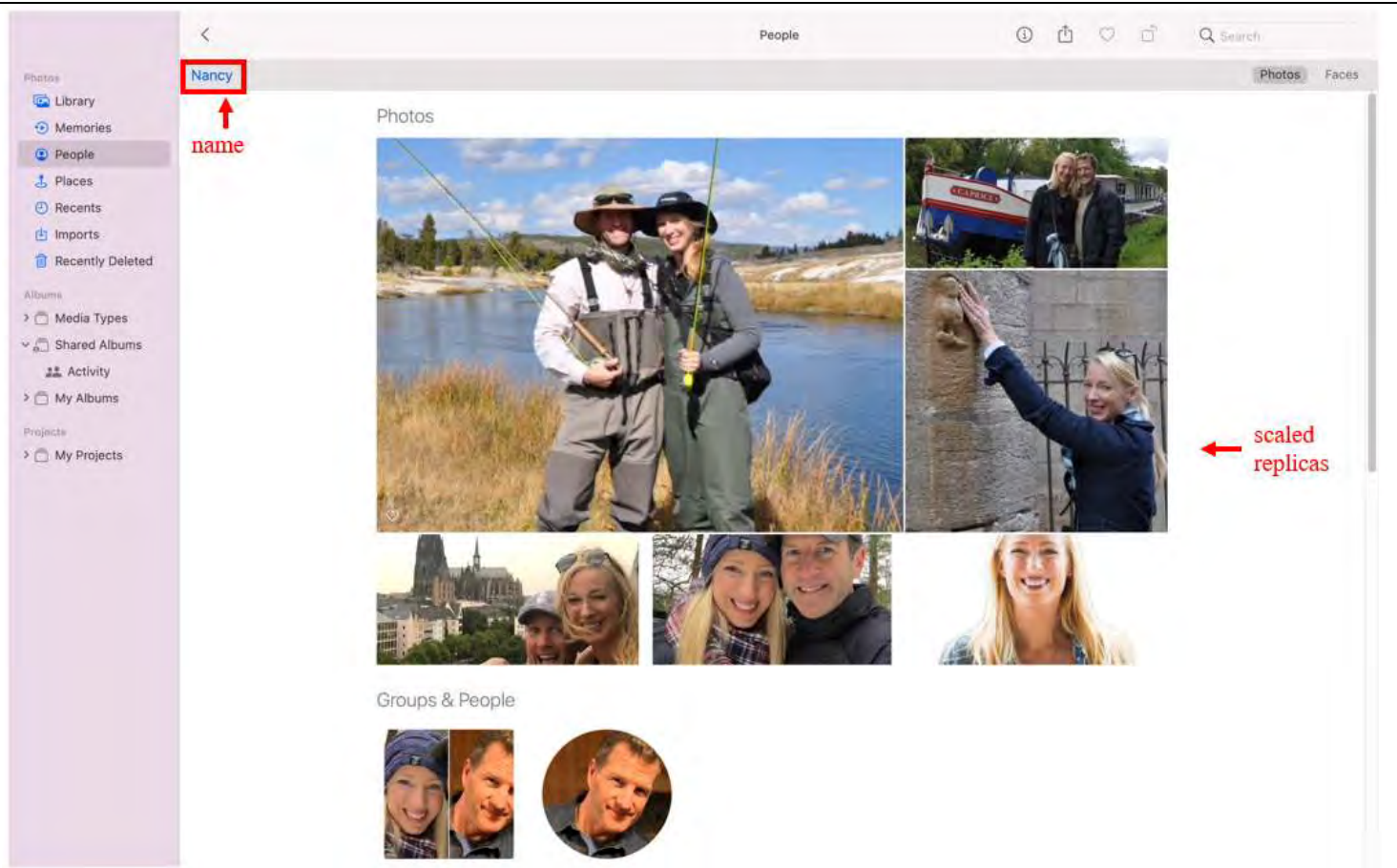


**10.** The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person

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.



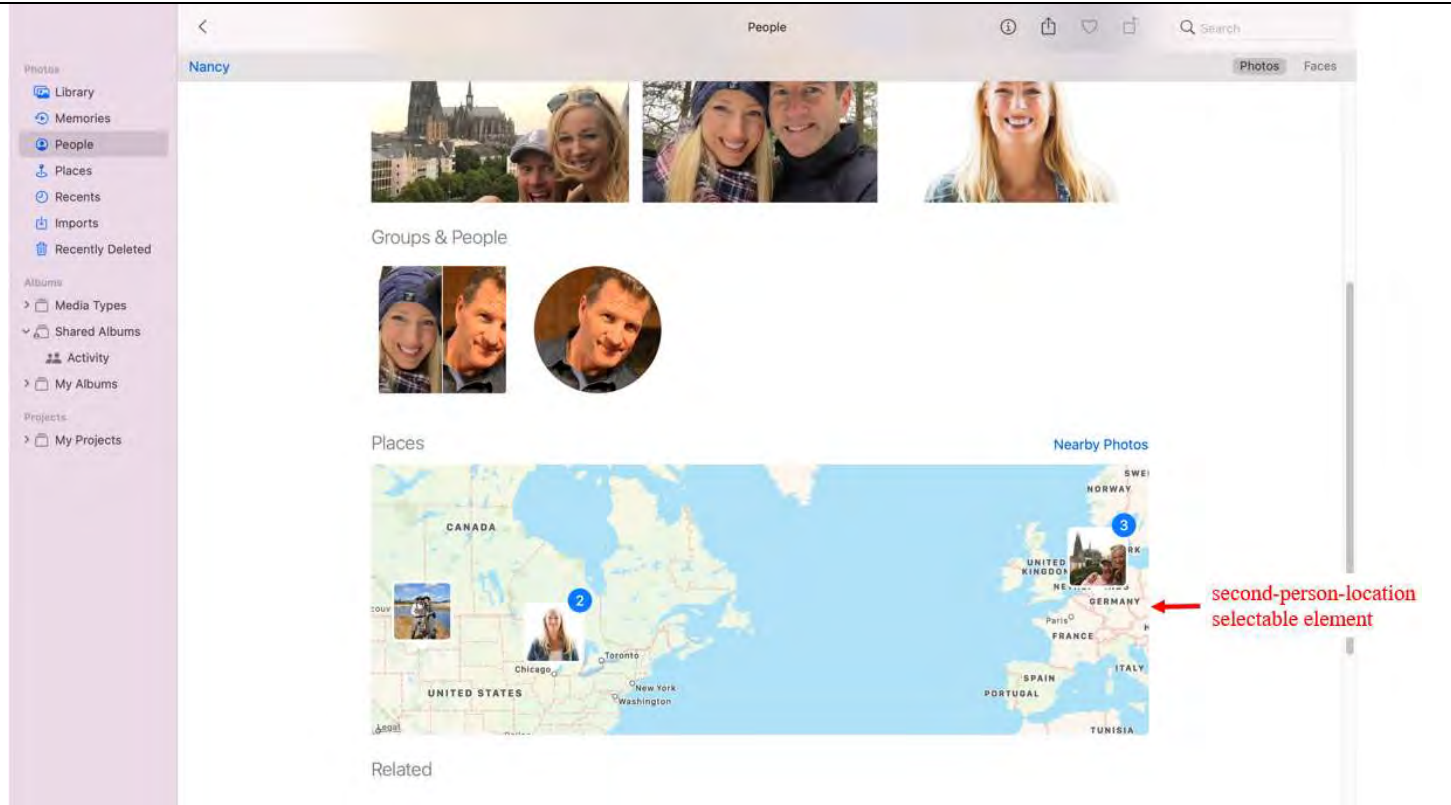
selectable thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.



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.

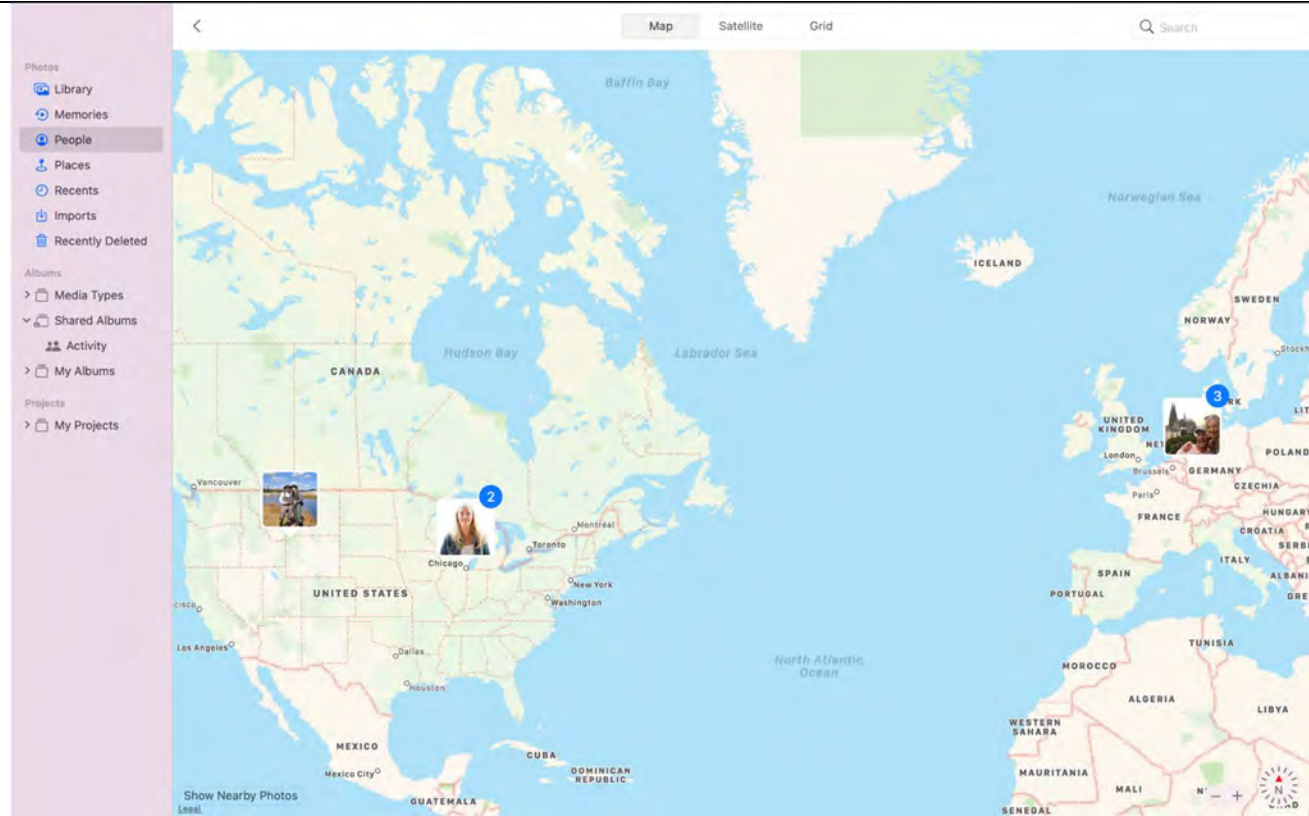
includes displaying a second-person-location selectable element.



**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.



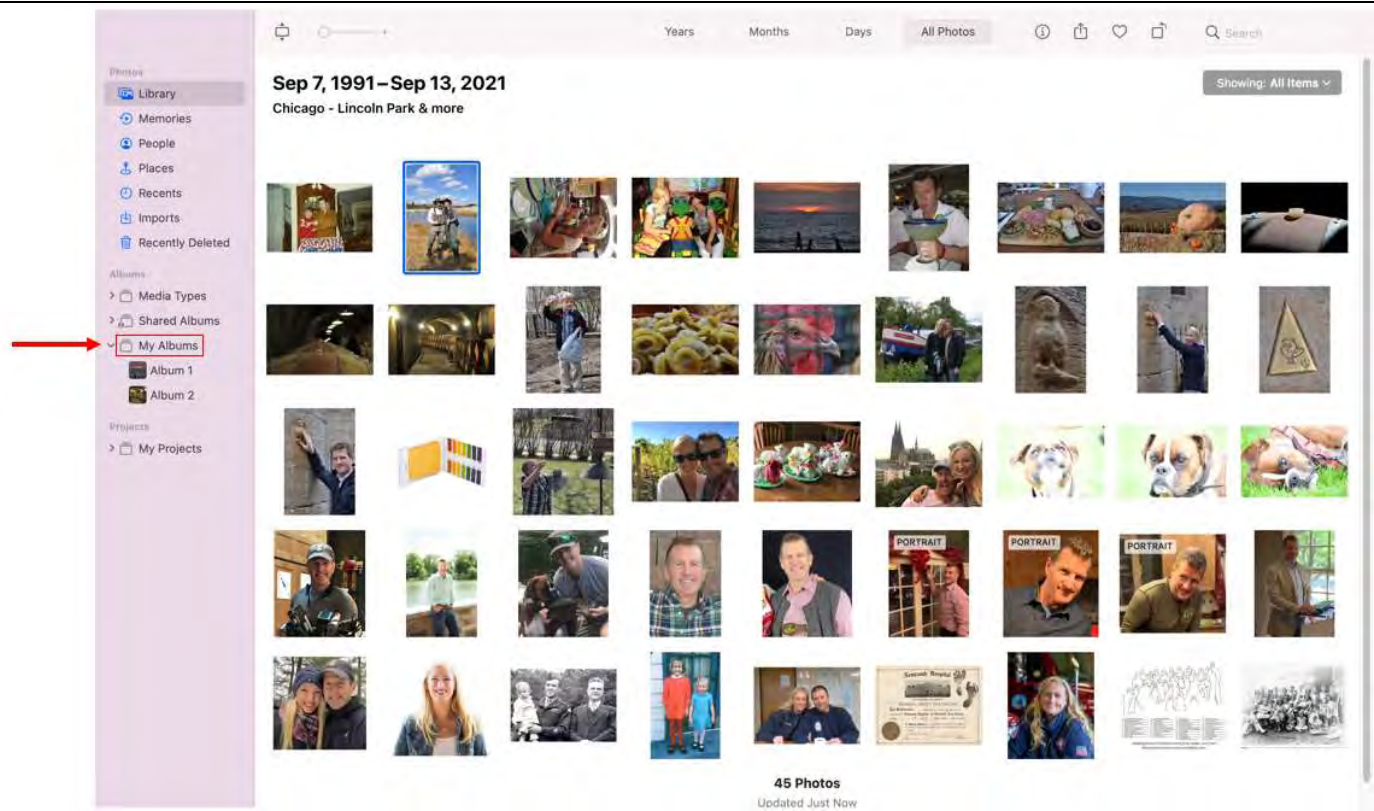
**13[pre]** The computer-implemented method of claim 1,

*See* information for claim 1.

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

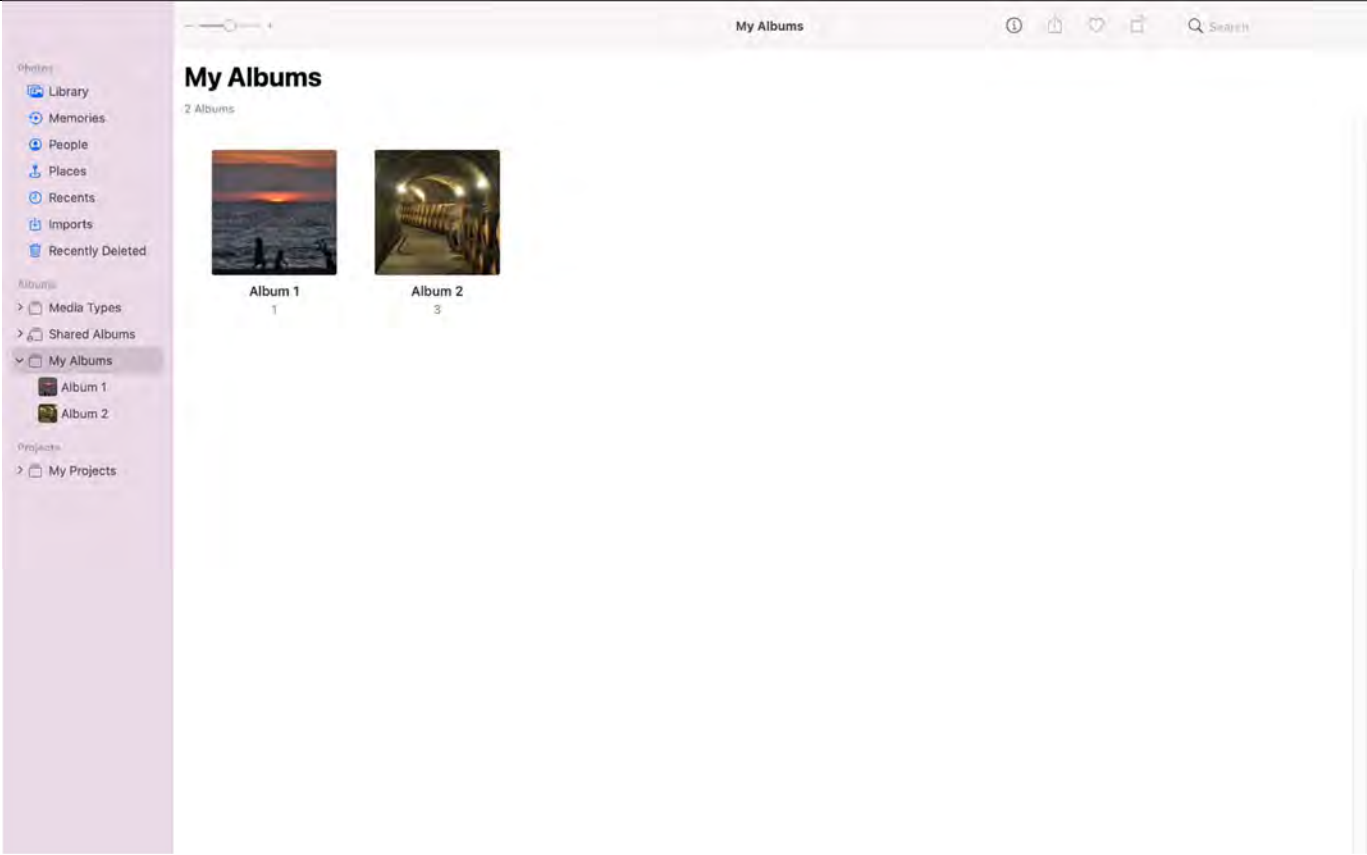
The plurality of selectable elements (*see* limitation 1[a]) further includes an album selectable element.

album selectable element,

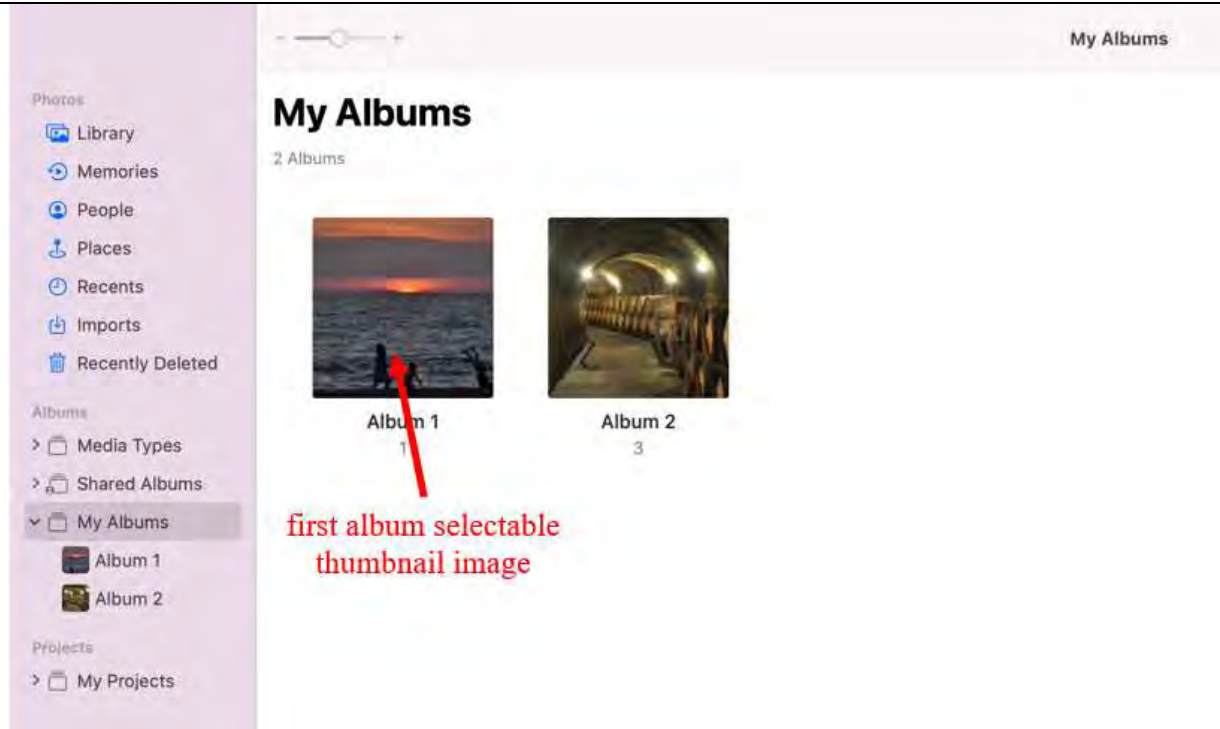


**13[b]** the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view

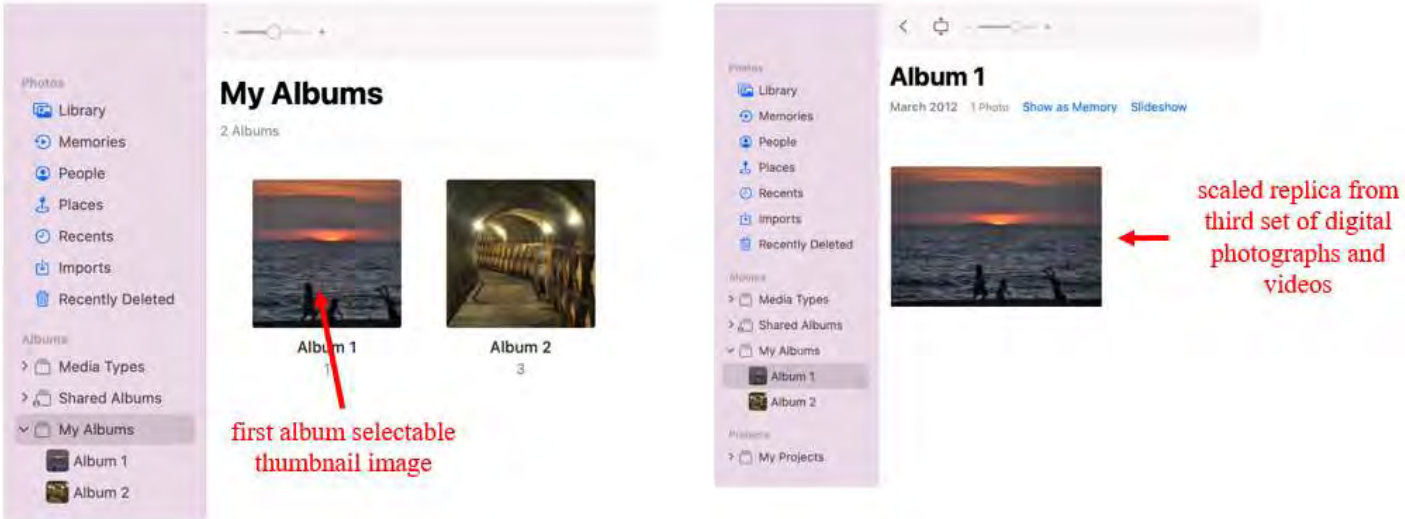
macOS displays an album view responsive to a click or tap of the album selectable element.

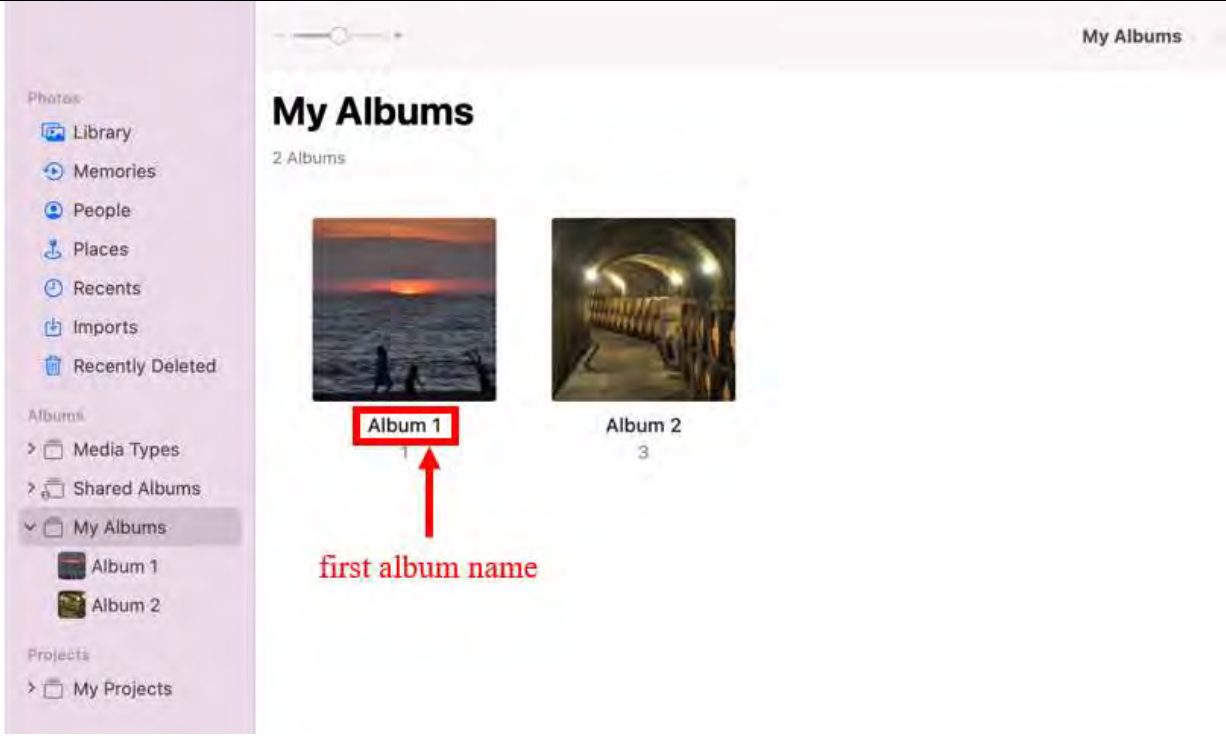
<p>including displaying:</p>	
<p><b>13[c][i]</b> (i) a first album selectable thumbnail image including a scaled representation of at least one digital photograph in a</p>	<p>The album view includes a first album selectable thumbnail image.</p>

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



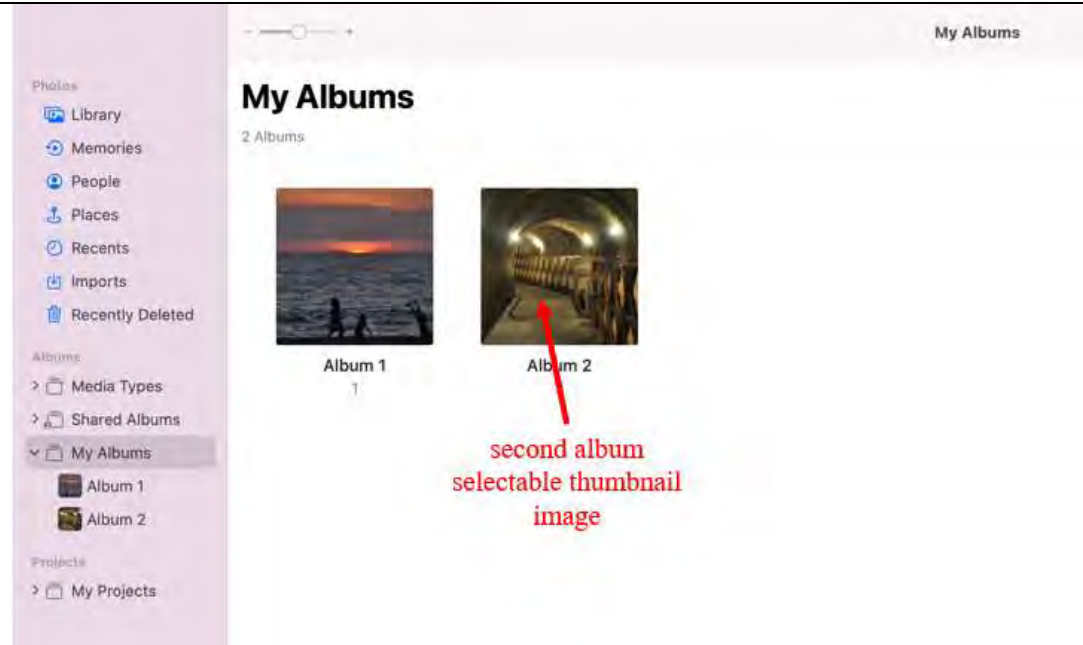
The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.

	 <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>

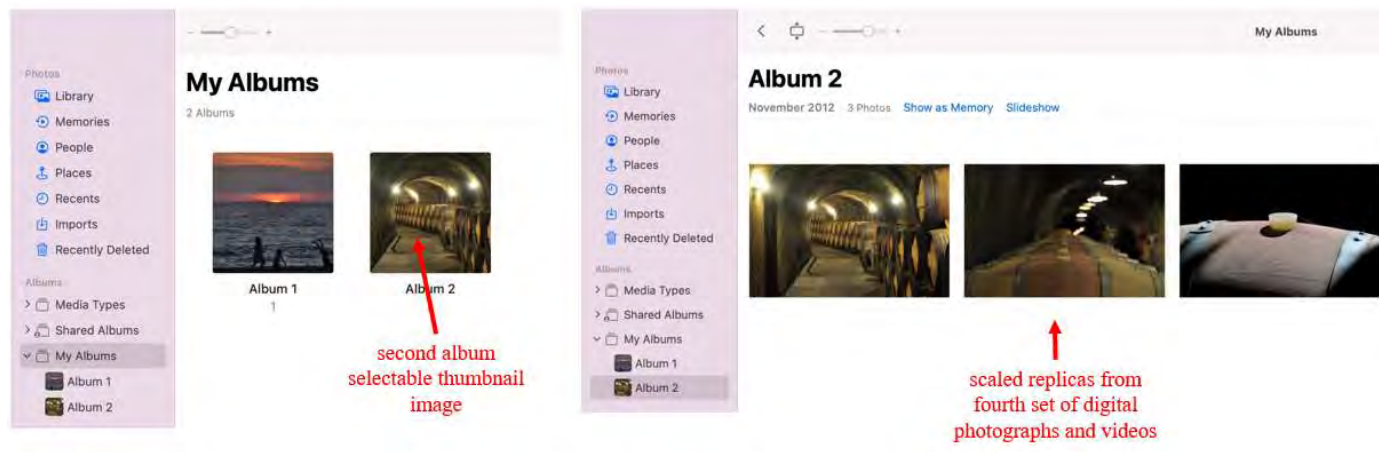
	
<p><b>13[c][iii]</b> (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of digital photographs and videos that</p>	<p>The album view includes a second album selectable thumbnail image.</p>

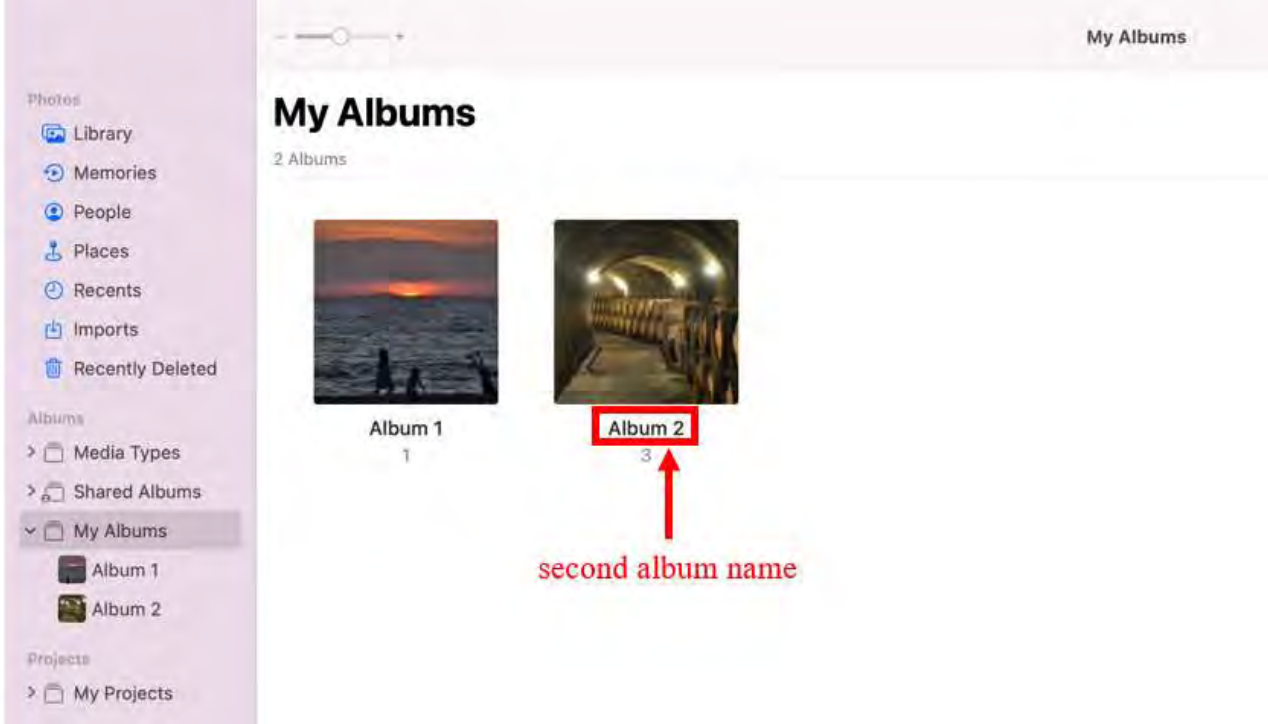


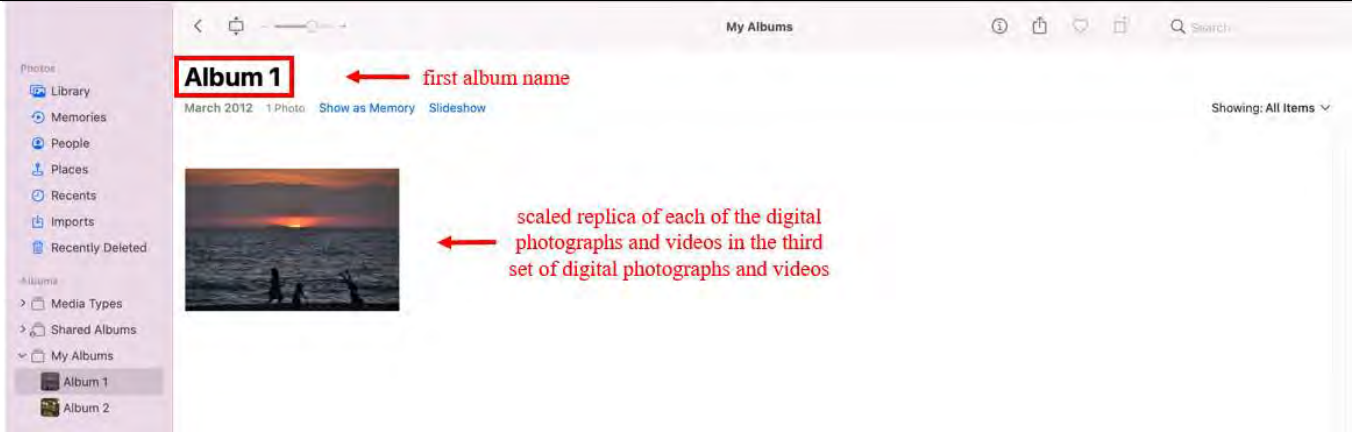
includes all of the digital photographs and videos associated with a second album tag; and



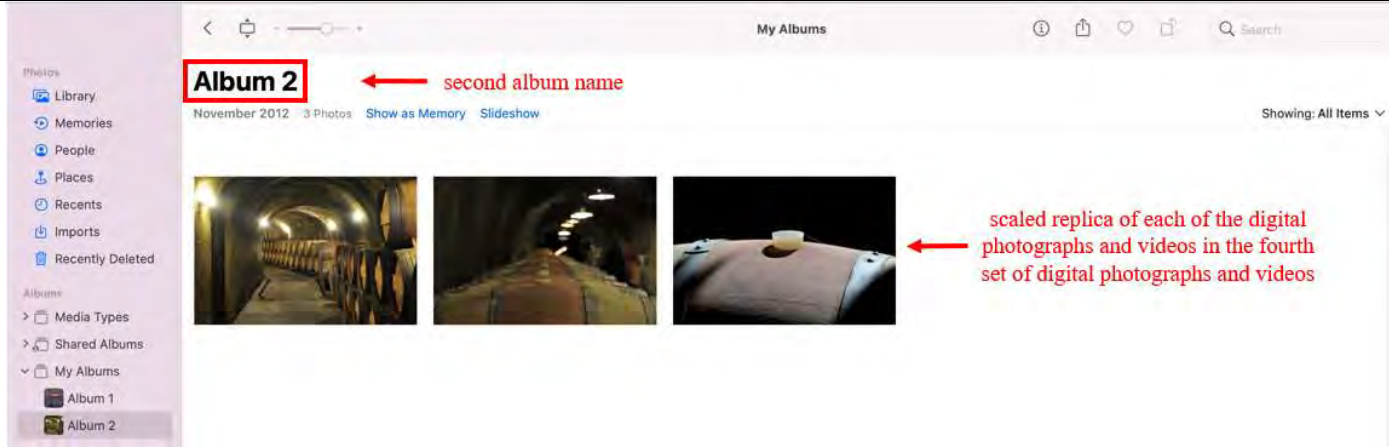
The second album selectable thumbnail image includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag.



<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><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><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.

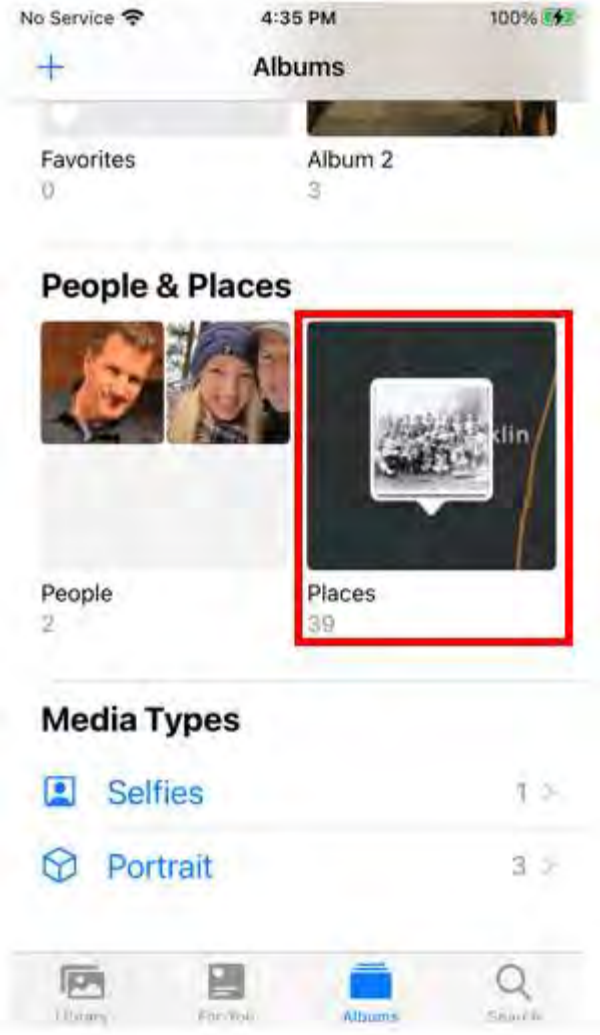


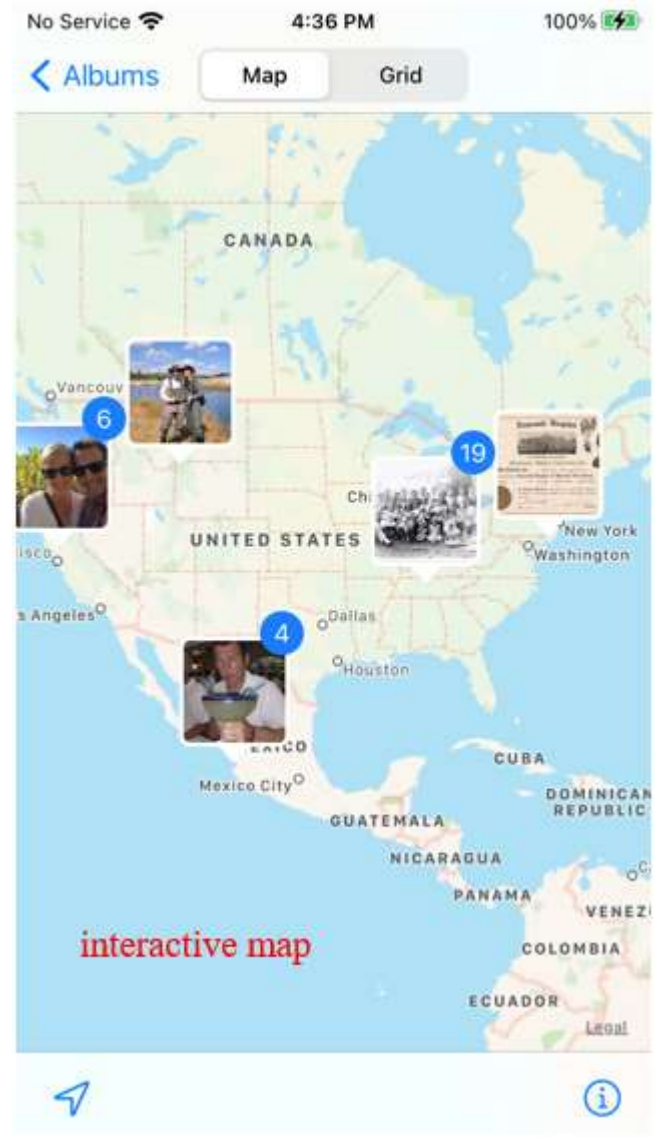
# **Exhibit C.1**

**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.

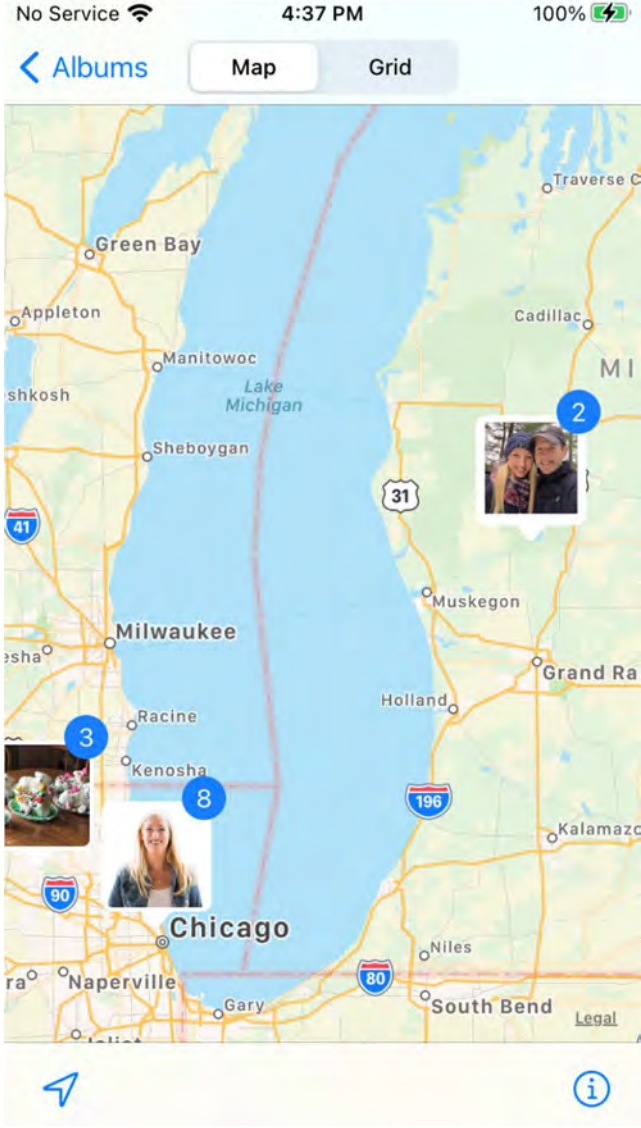
CLAIM ELEMENT	APPLE’S INFRINGEMENT
<b>1[pre]</b> A method comprising:	To the extent the preamble is limiting, iOS performs a method, as detailed below.
<b>1[a]</b> responsive to a first input, causing a map view to be displayed on an interface, the map view including:	Responsive to a first input (e.g.,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

	
<p><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>

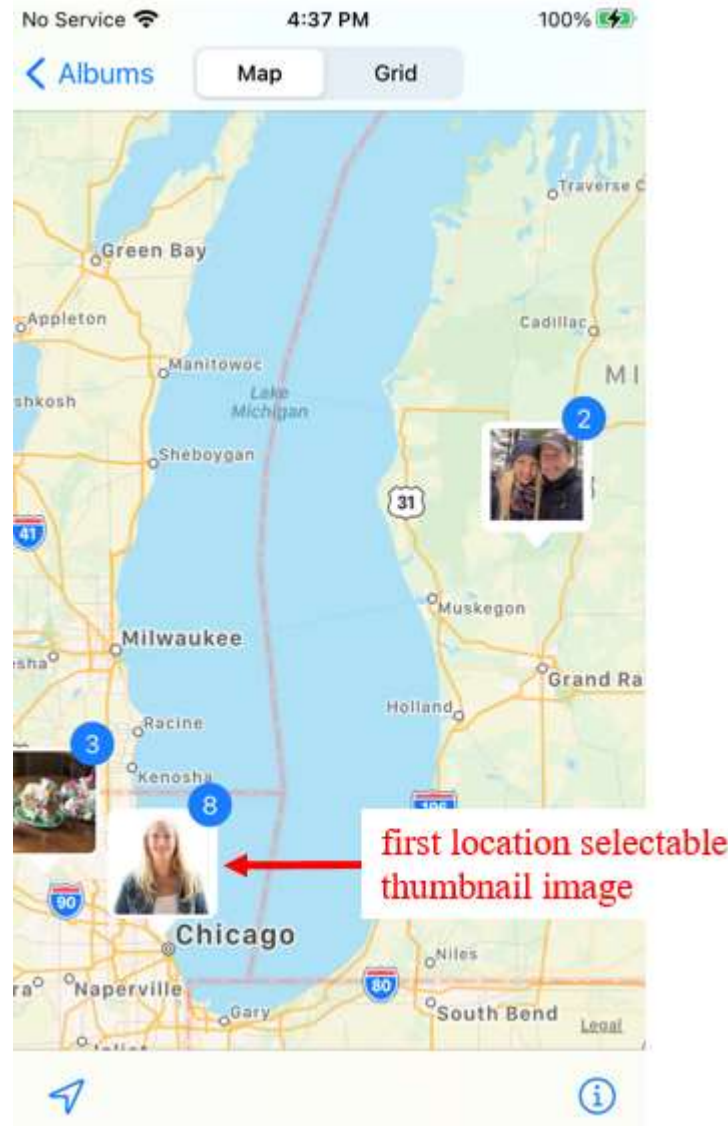


A zoomed in view is shown below.



	 <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>

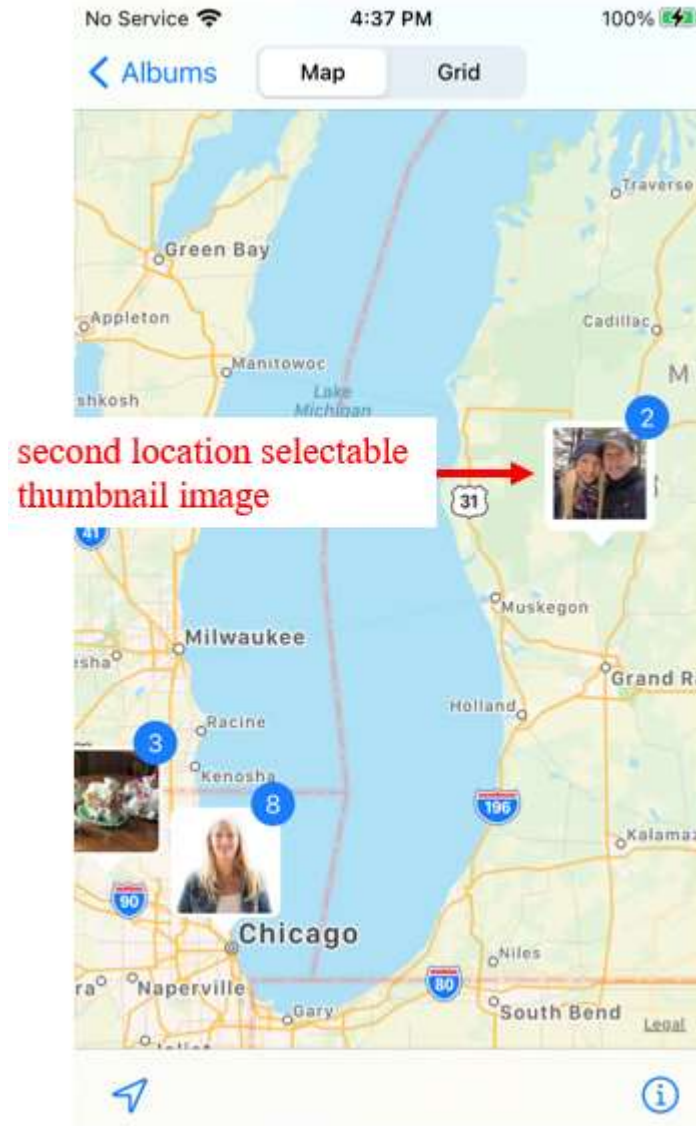
first location on the interactive map; and



**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;

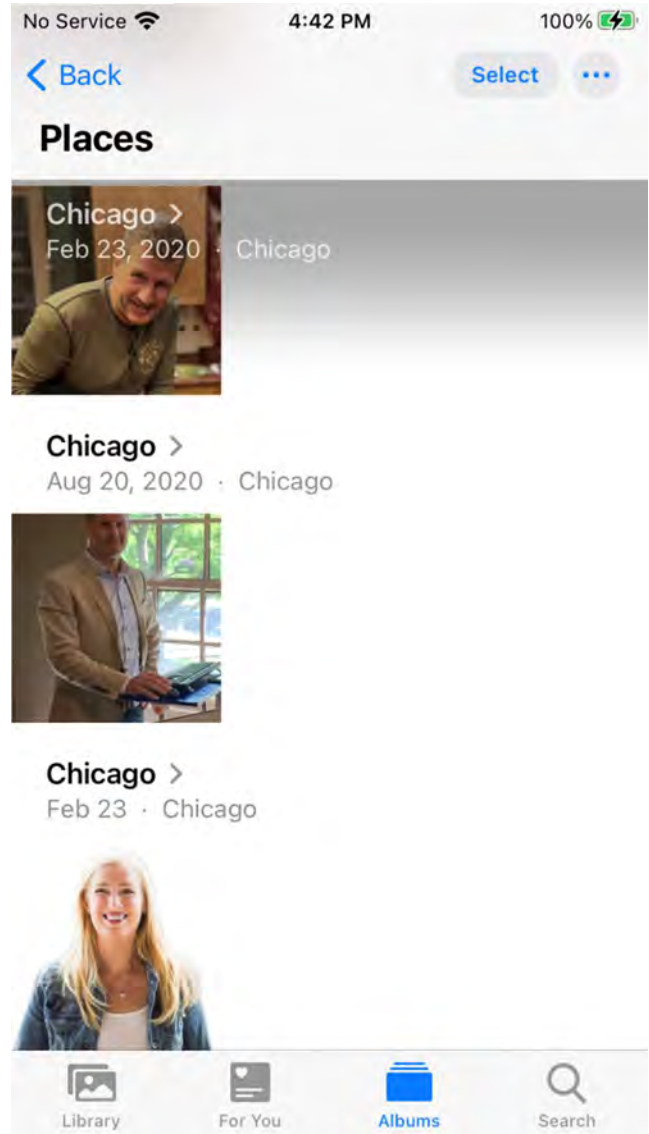


second location selectable thumbnail image

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

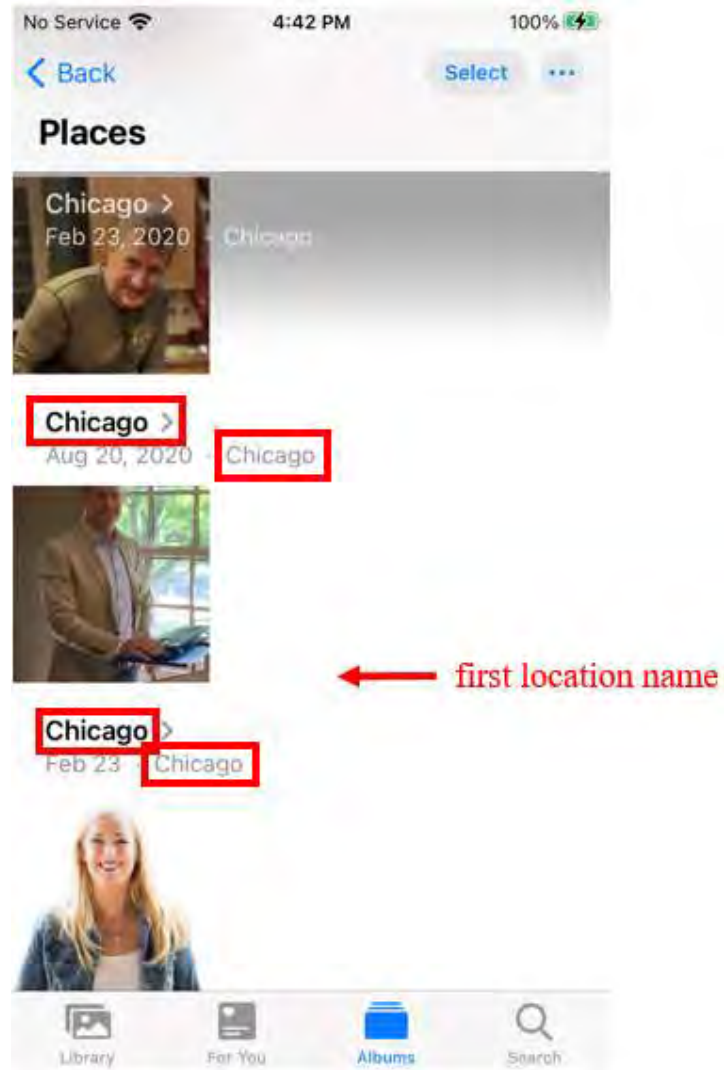
Responsive to an input that is indicative of a selection of the first location selectable thumbnail image, iOS causes a first location view to be displayed on the interface.

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



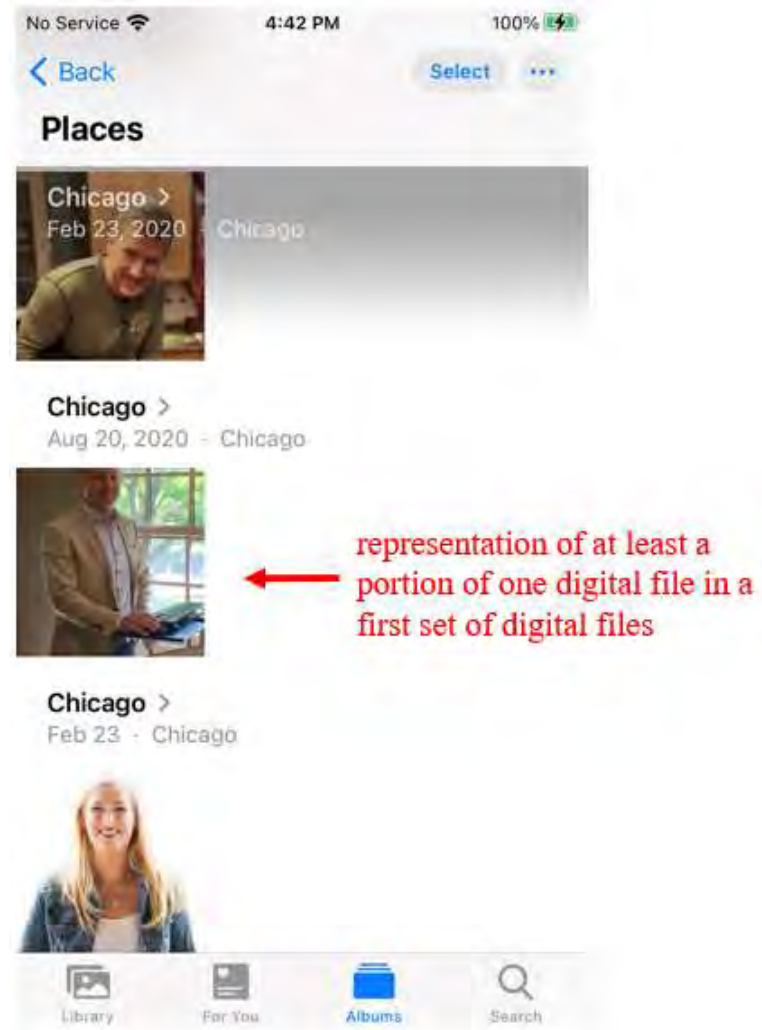
1[b][i] (i) a first location name associated with the first location and

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

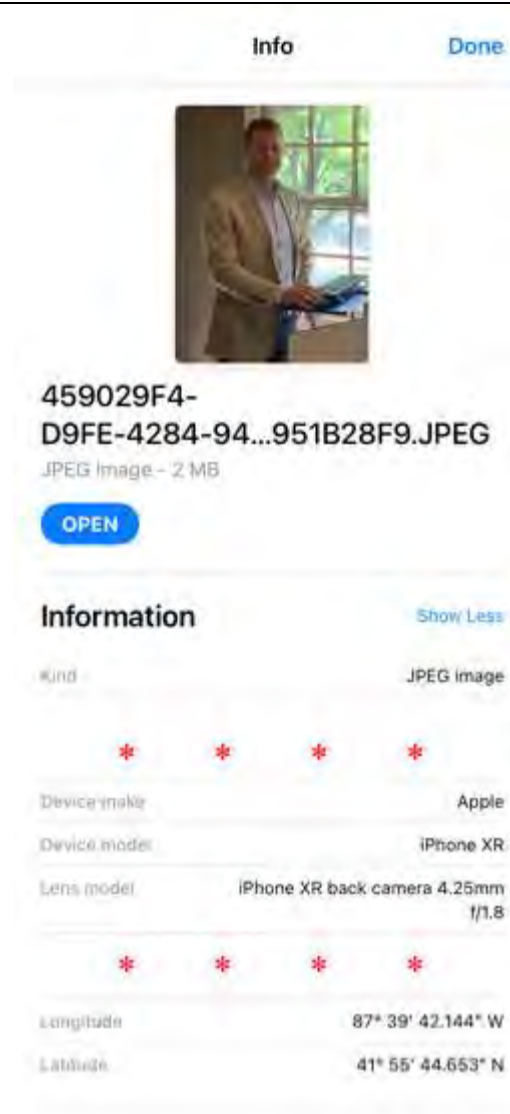


**1[b][ii]** (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs of one or more digital imaging devices, the first set of digital files including digital files associated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

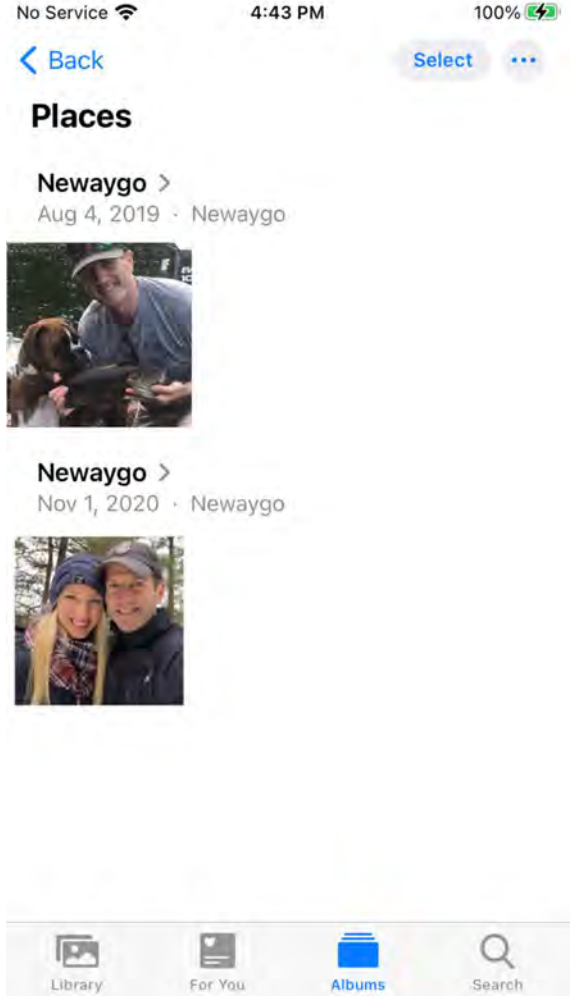
The first location view includes a representation of at least a portion of one digital file in a first set of digital files.



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).

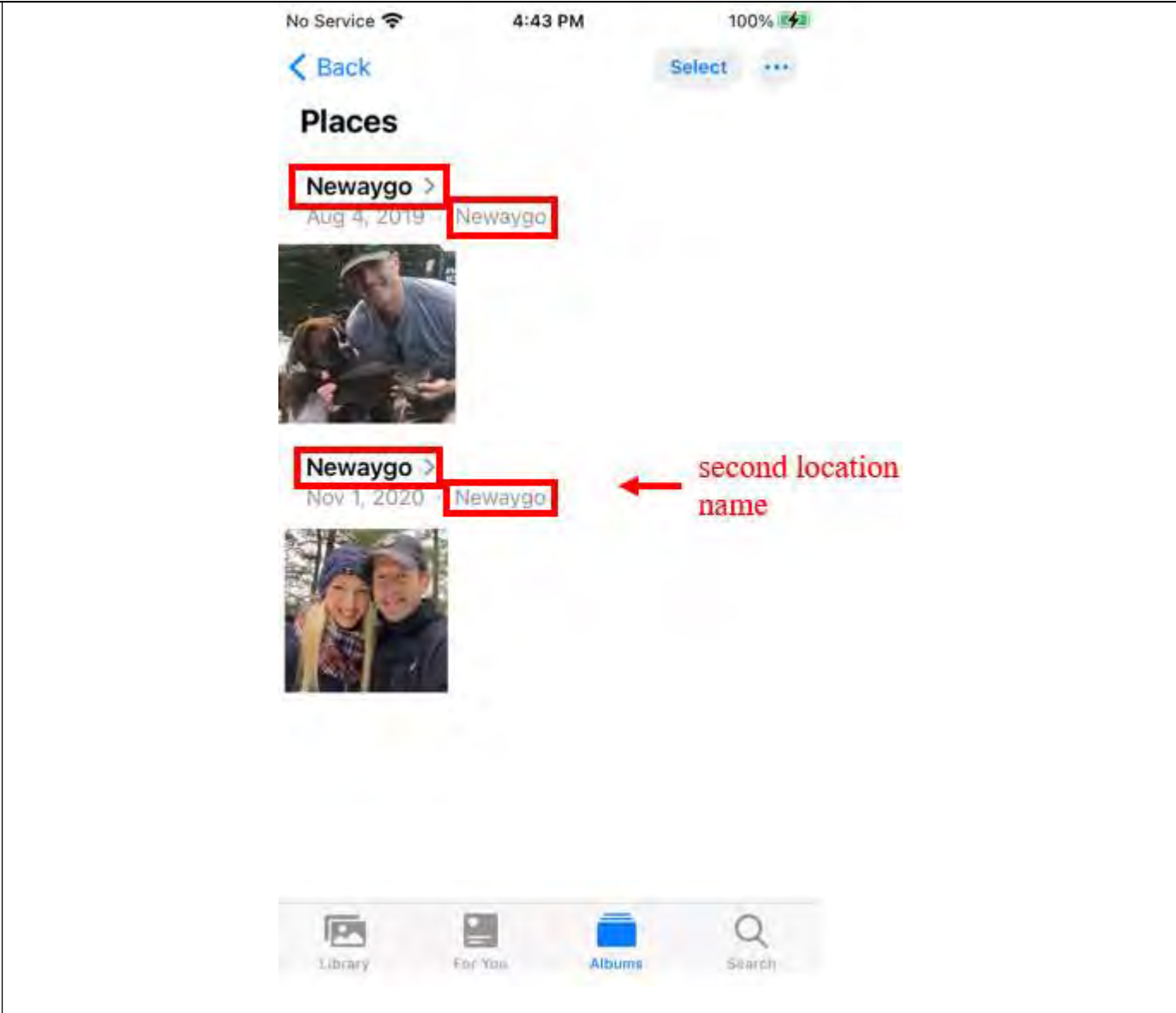


In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone XR (a digital imaging device), as shown in the iOS Files application. The first set of digital files includes digital files associated with the first location (in this example, Chicago).

<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 an iOS interface titled 'Places'. 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 and a blue 'Select' button with a three-dot menu icon. The main content area is titled 'Places' and 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 four icons: '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

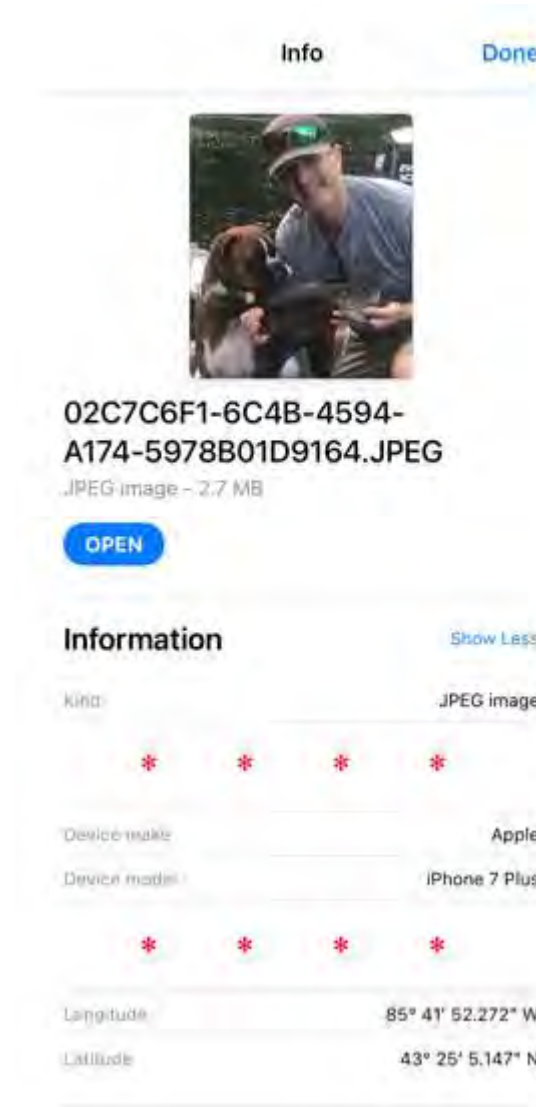
The second location view includes a representation of at least a portion of one digital file in a second set of digital files.

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



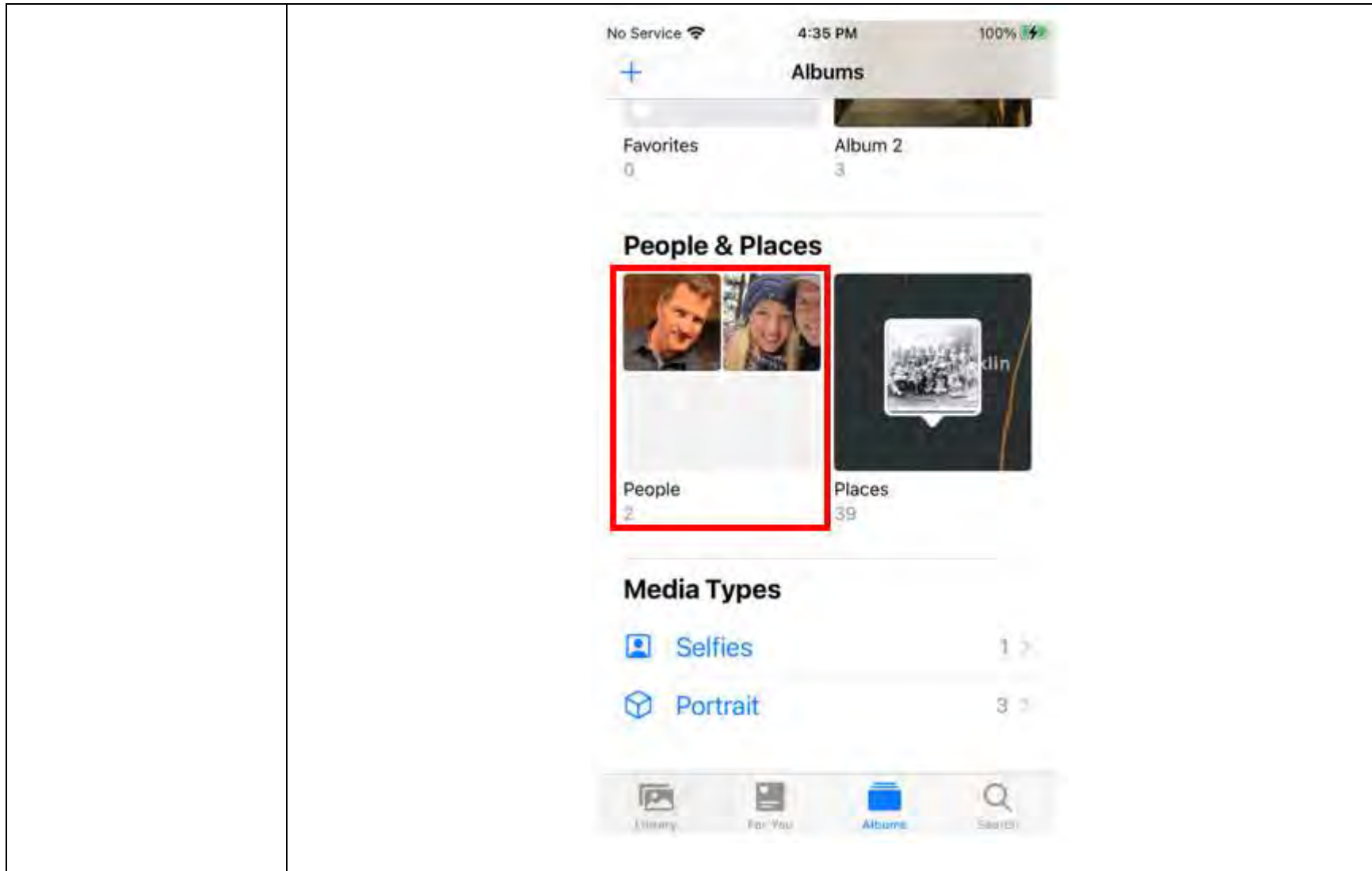
representation of at least a portion of one digital file in a second set of digital files

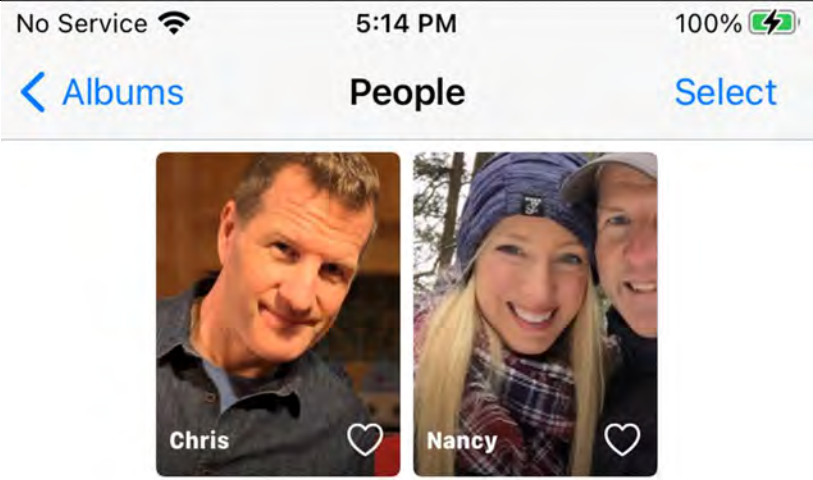
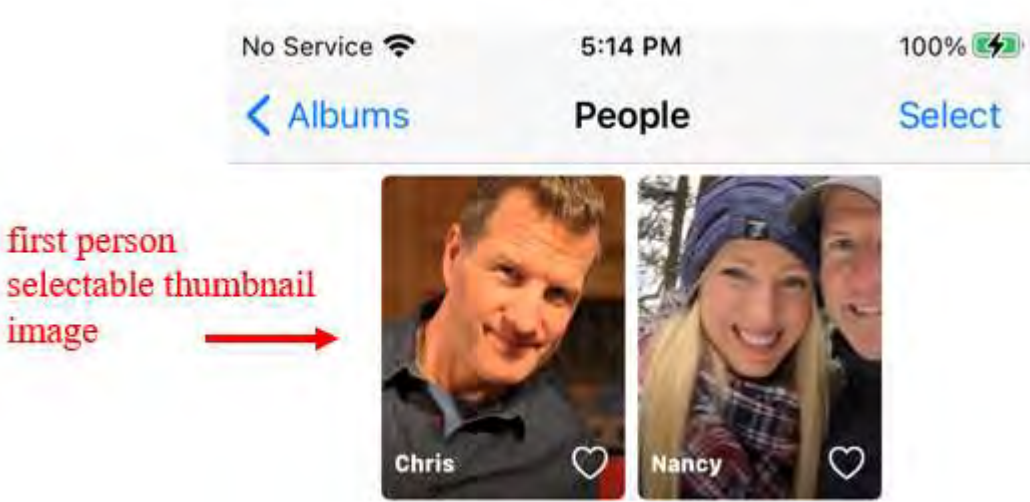
Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

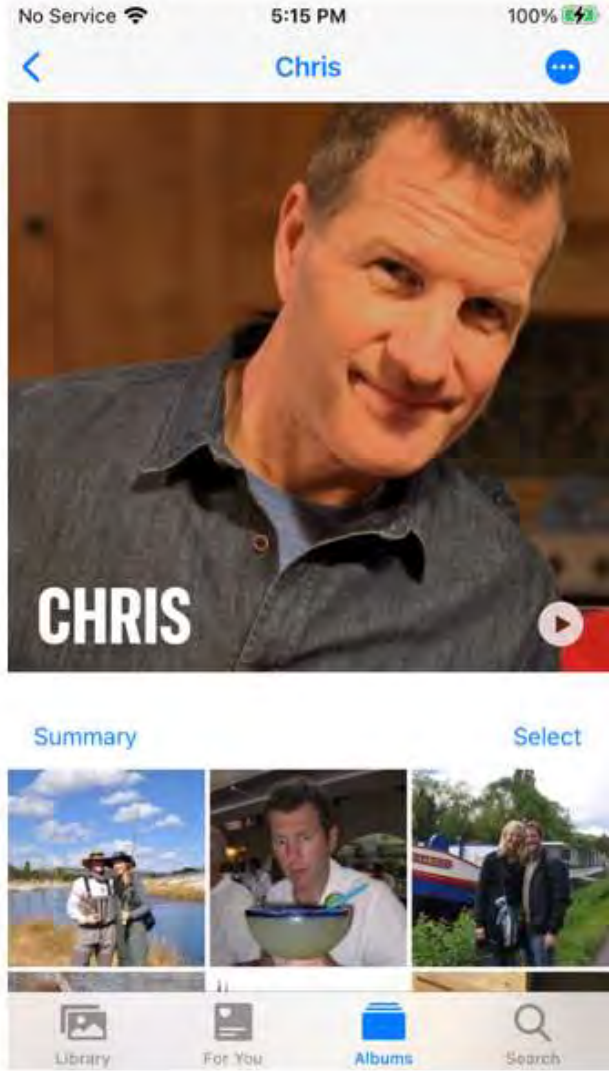


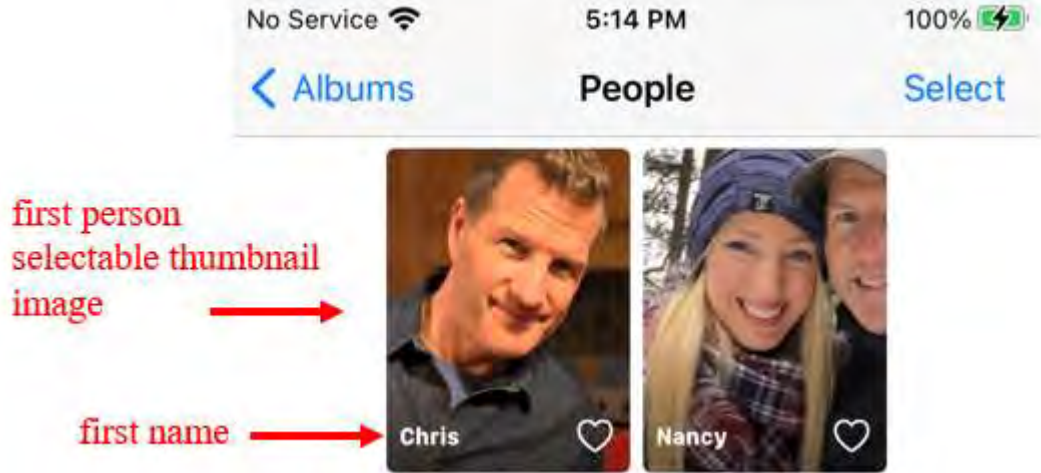
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iOS

	<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>



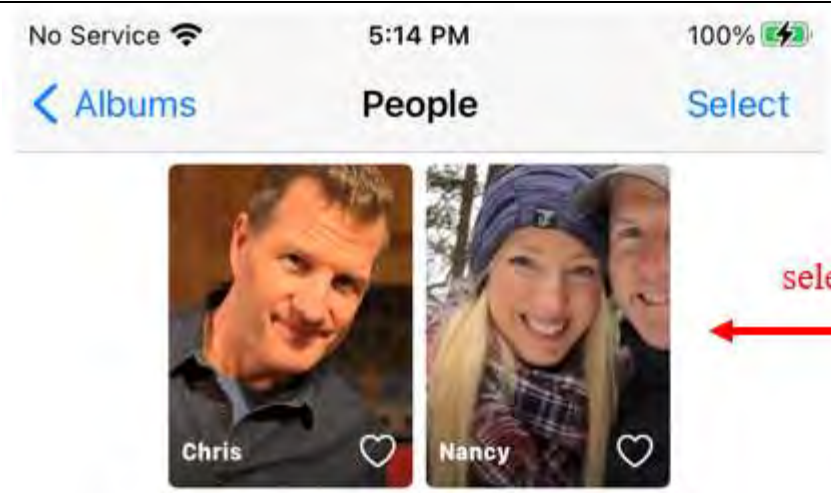
	
<p><b>1[d]ii</b> (i) a first person selectable thumbnail image including a representation of a face of a first person, the first person being associated with a third set of digital files including digital photographs and videos;</p>	<p>The people view includes a first person selectable thumbnail image 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 data-bbox="730 1036 1018 1253">representations of digital images in third set of digital photographs and videos</p> <p data-bbox="1024 1084 1102 1117">→</p>
<p data-bbox="205 1336 514 1432"><b>1[d][iii]</b> (ii) a first name associated with the first person, the first name</p>	<p data-bbox="556 1336 1831 1401">The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.</p>

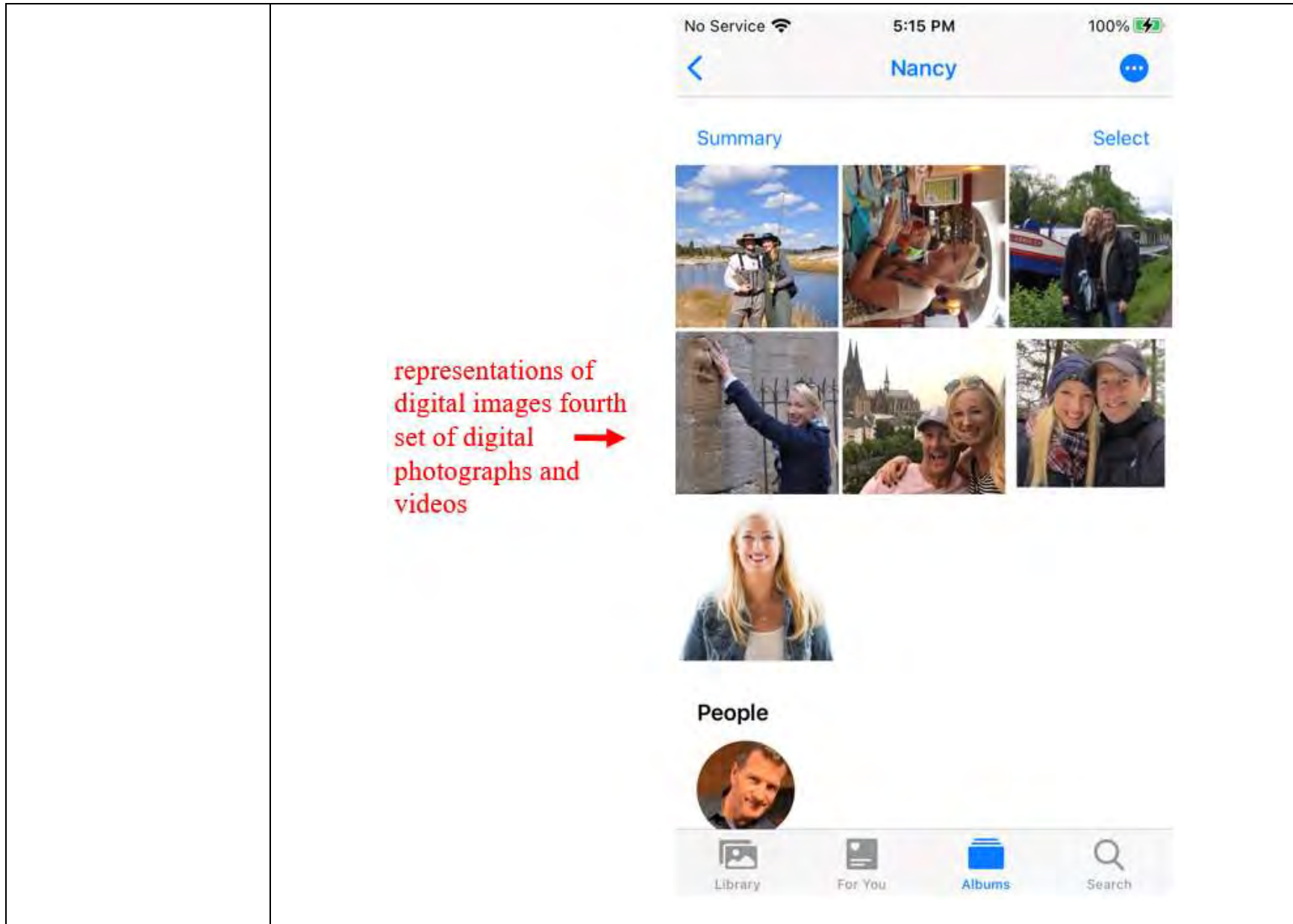
<p>being displayed adjacent to the first person selectable thumbnail image;</p>	 <p>The screenshot shows the 'People' view on an iPhone. At the top, the status bar displays 'No Service', '5:14 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Albums', 'People', and 'Select'. Two person thumbnails are shown side-by-side. The first thumbnail is of a man, and the second is of a woman. Below each thumbnail is their first 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 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>

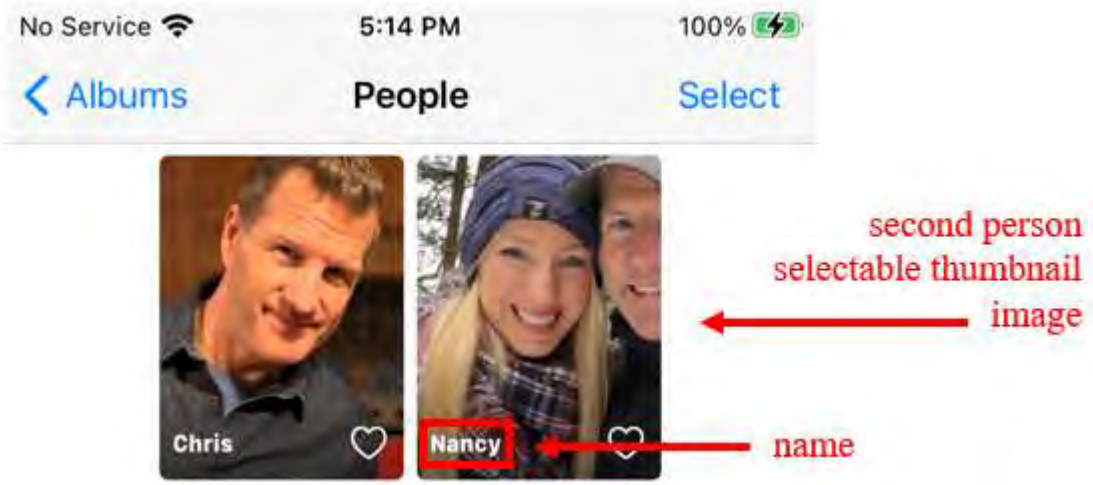



associated with a fourth set of digital files including digital photographs and videos; and

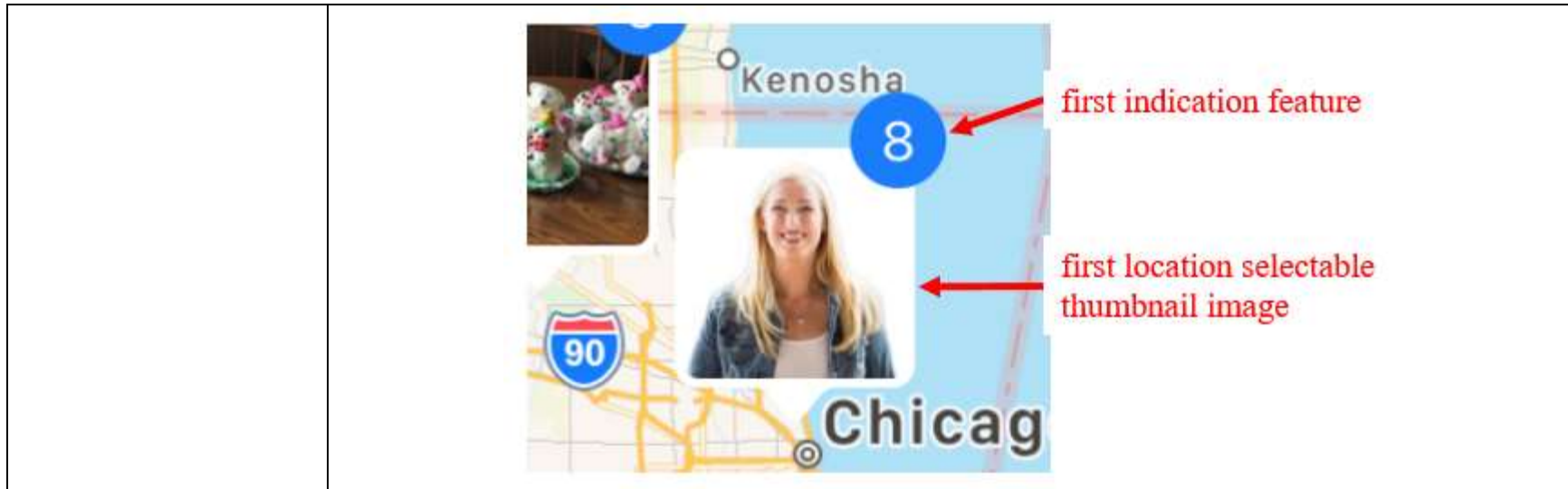


The second person is associated with a fourth set of digital files including digital photographs and videos.




<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>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. The first thumbnail is of a man and is labeled 'Chris'. The second thumbnail is of a woman and is labeled 'Nancy'. A red box highlights the name 'Nancy', and a red arrow points from the text 'name' to this box. Another red arrow points from the text 'second person selectable thumbnail image' to the woman's thumbnail.</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>

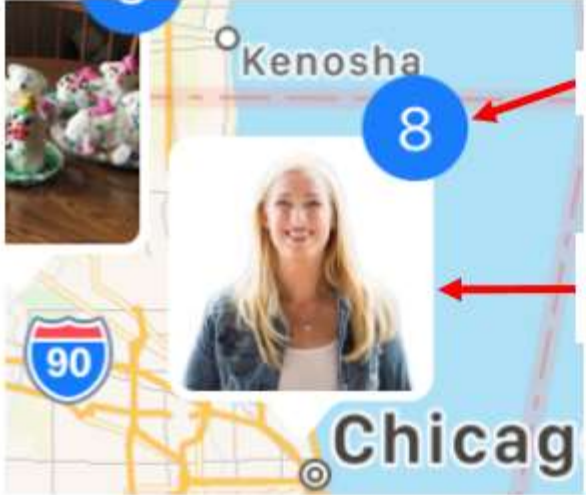
<p><b>2[a]</b> the map view further includes a first indication feature associated with the first location selectable thumbnail image</p>	<p>The map view includes a first indication feature associated with the first location selectable thumbnail image.</p>  <p>The image shows a map view with a blue circle containing the number '8' overlaid on it. A red arrow points from the text 'first indication feature' to this circle. Below the circle is a thumbnail image of a woman with blonde hair, also with a red arrow pointing from the text 'first location selectable thumbnail image' to it. The map shows a road labeled '90' and cities 'Kenosha' and 'Chicag'.</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>




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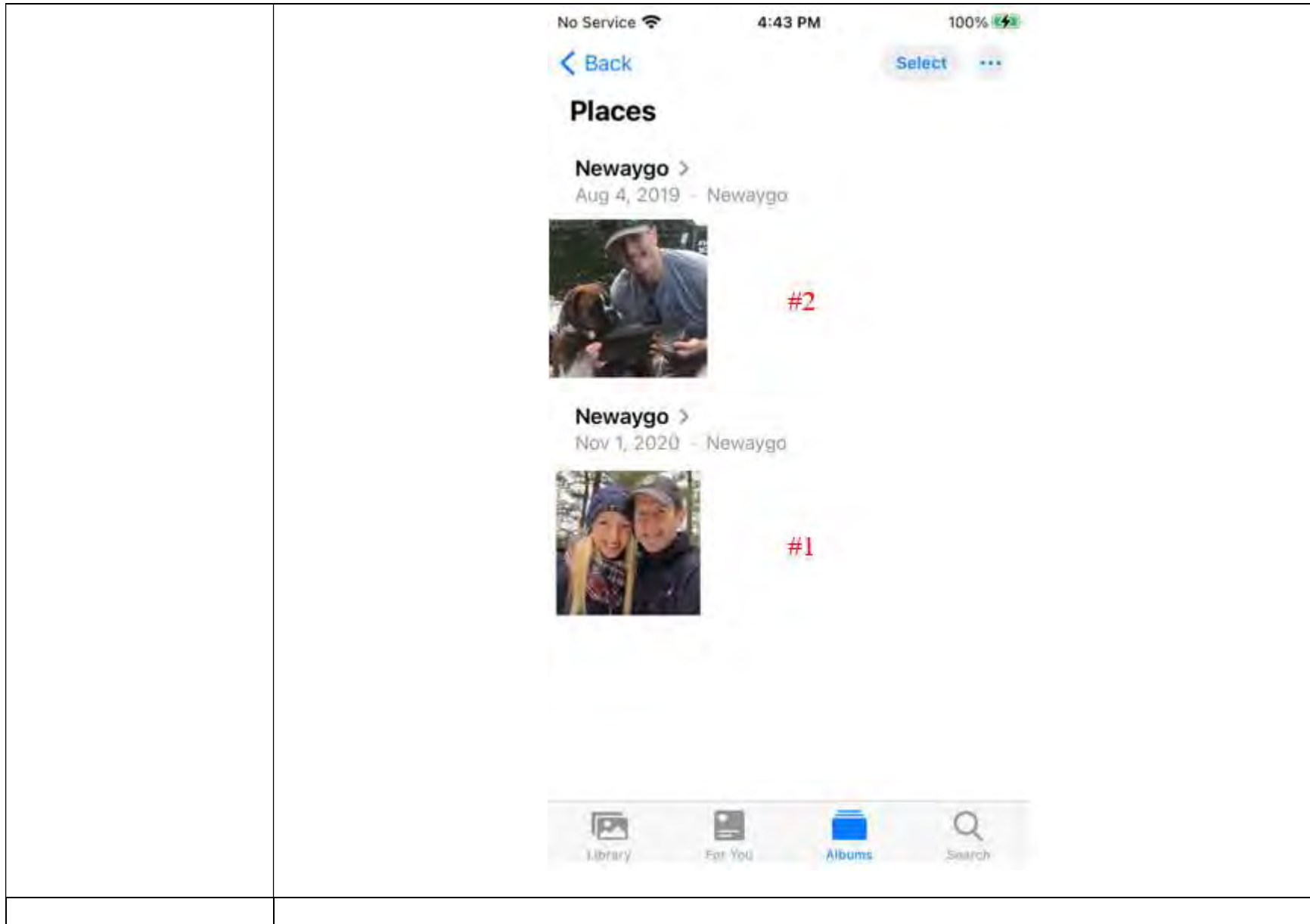
<p><b>3.</b> The method of claim 2, wherein the first indication feature is connected to the first location selectable thumbnail image.</p>	<p>As shown below, the first indication feature is connected to the first location selectable thumbnail image.</p>

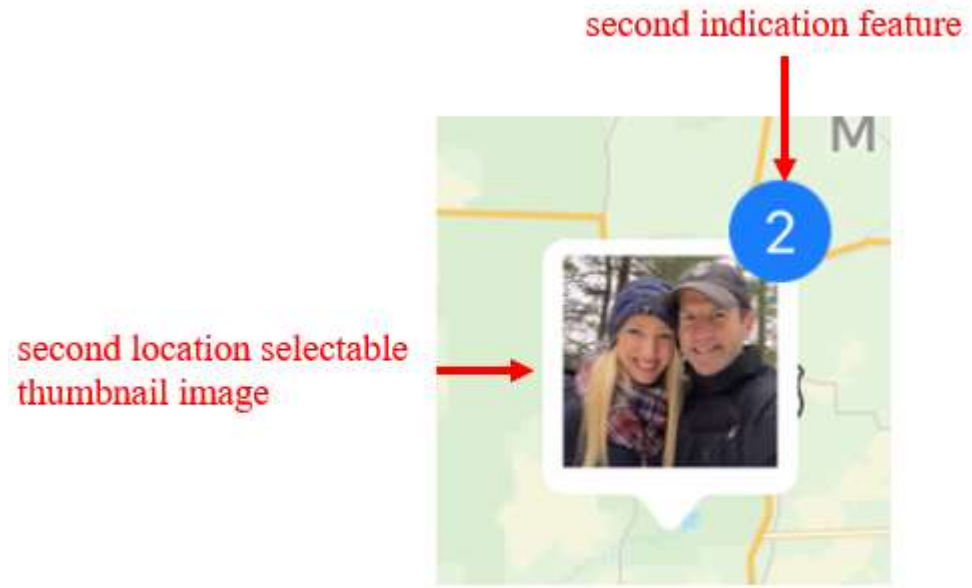
	
<p><b>4.</b> The method of claim 2, wherein the first indication feature includes a first number indicative of the number of digital files in the first set of digital files.</p>	<p>The first indication feature includes a first number indicative of the number of digital files in the first set of digital 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>

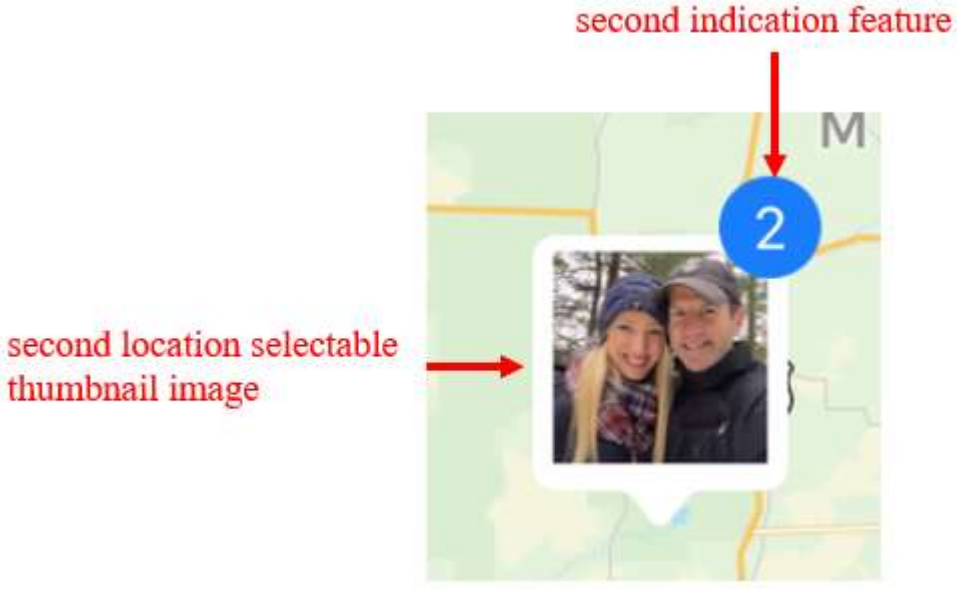
	
<p><b>5[a]</b> The method of claim 2, wherein the map view further includes a second indication feature associated with the second location selectable thumbnail image,</p>	<p>The map view also includes a second indication feature associated with the second location selectable thumbnail image.</p>



	 <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>

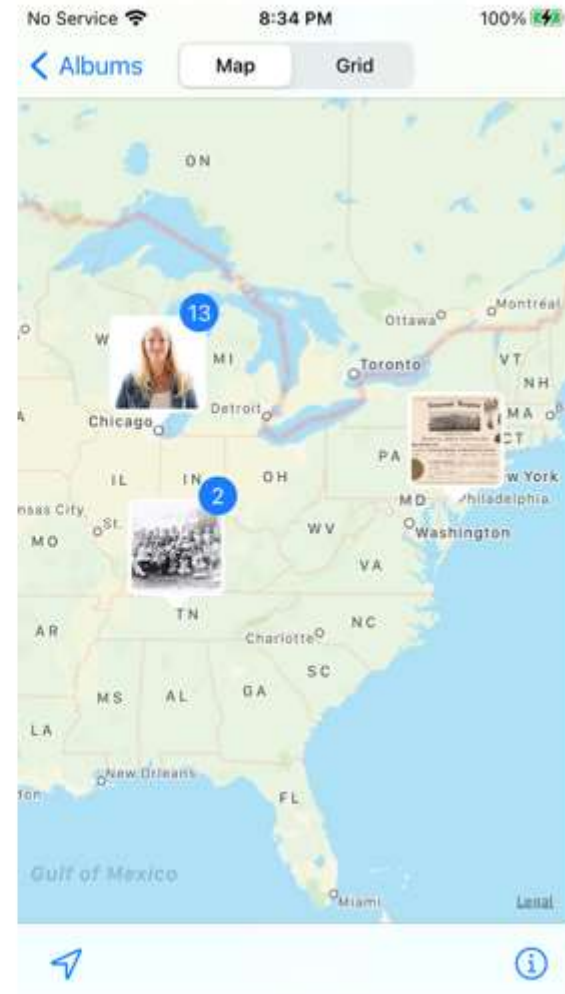
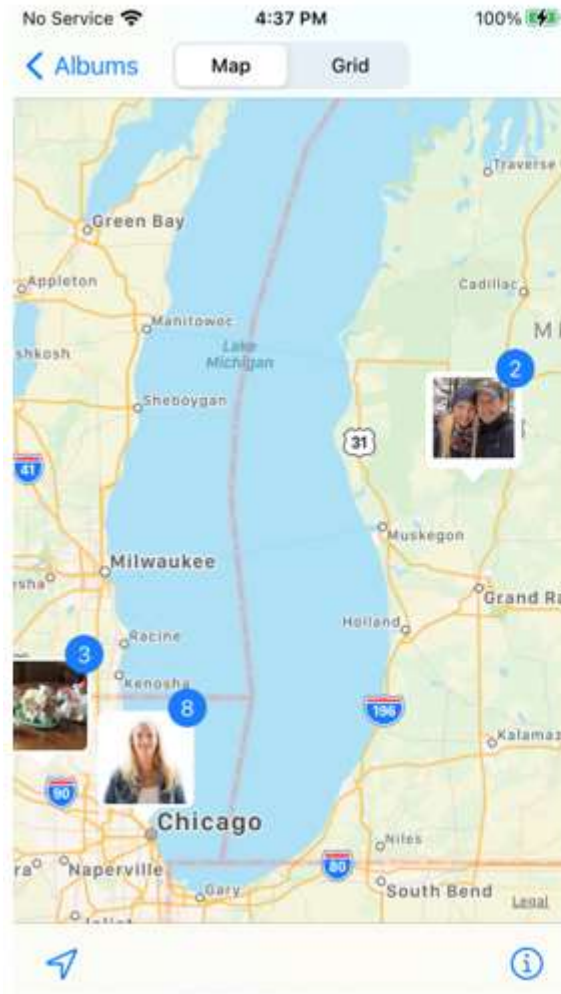


<p><b>6.</b> The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p>	<p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>  <p>The diagram illustrates a map interface.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



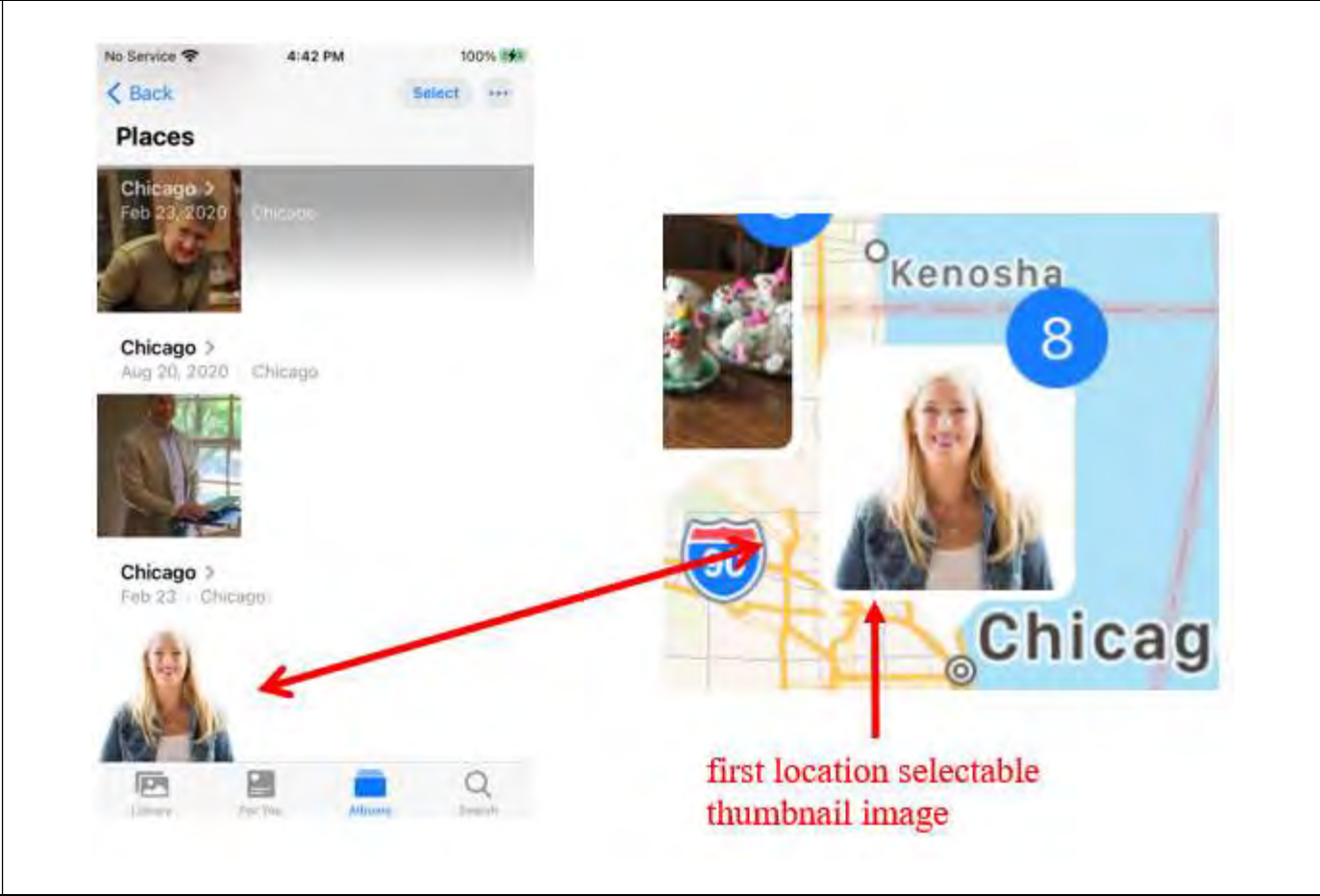
**12[pre]** The method of claim 1, wherein

See information for claim 1.

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

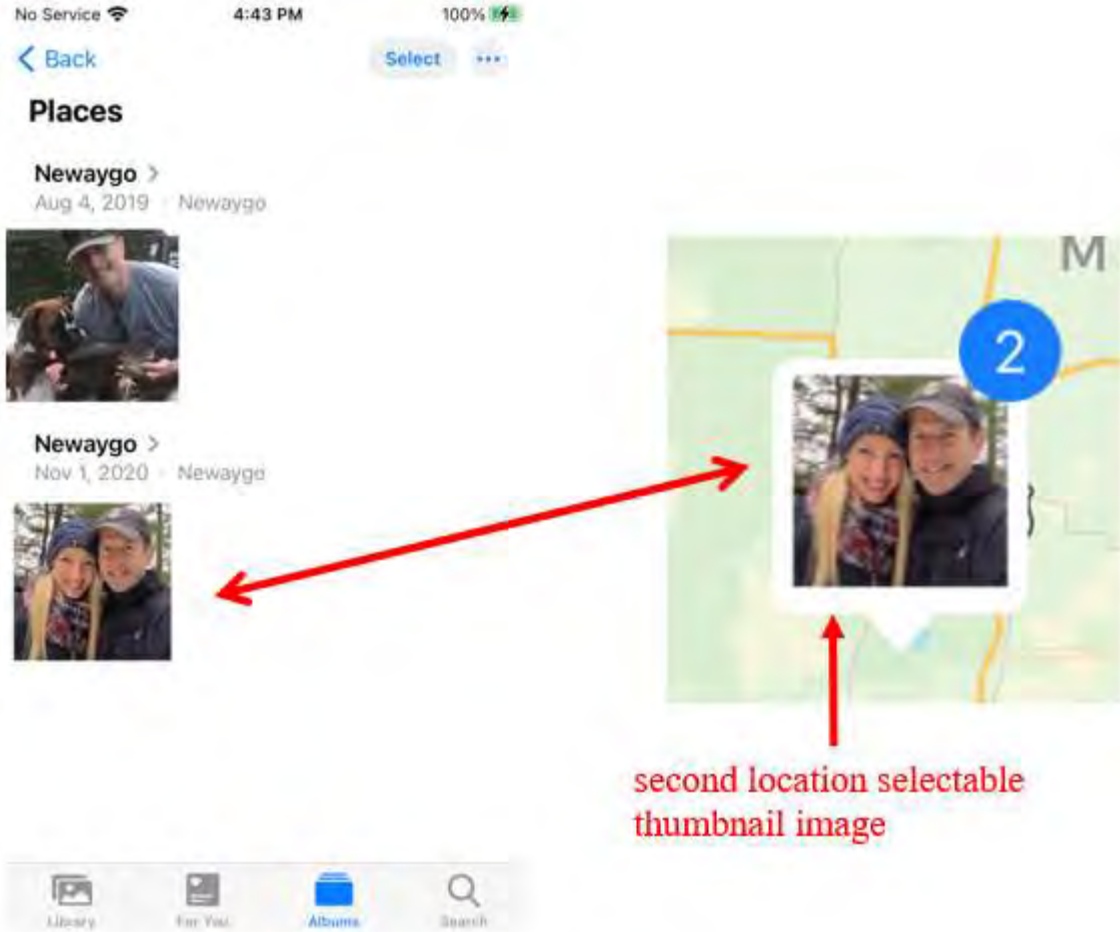
The first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files.

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



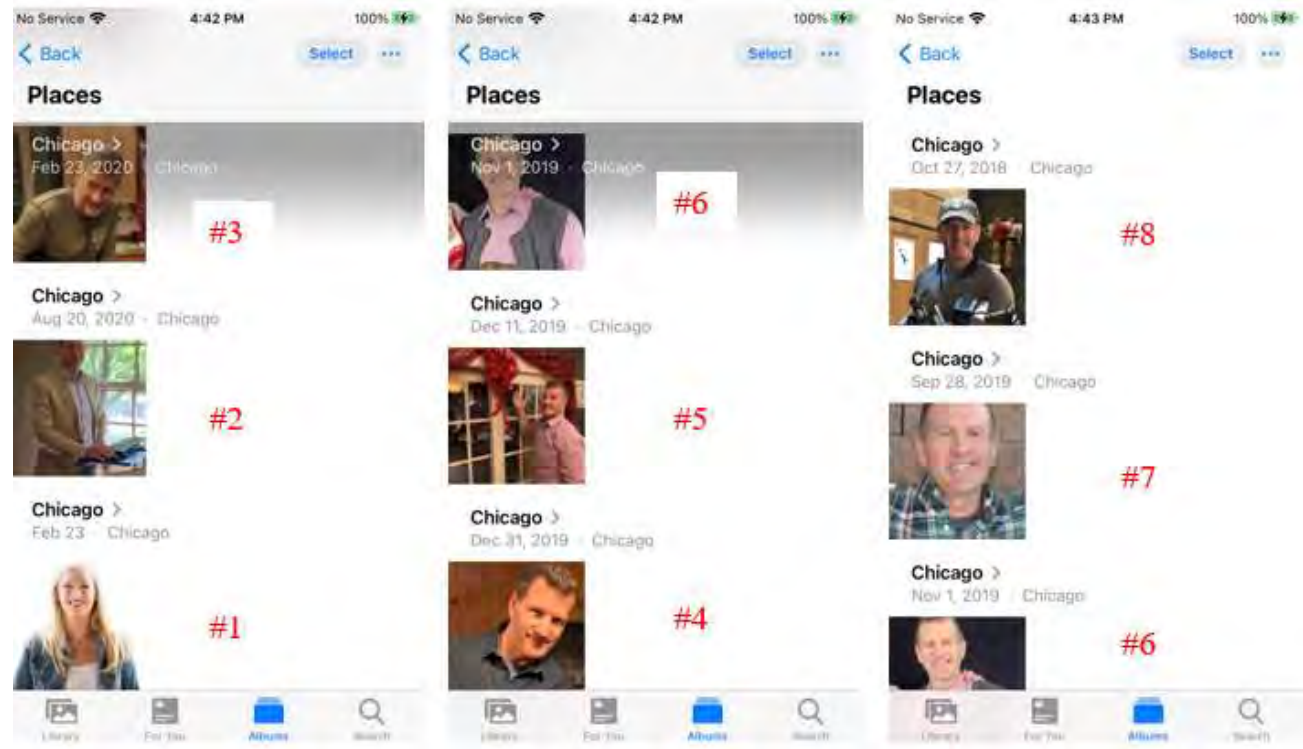
**12[b]** wherein the second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

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>

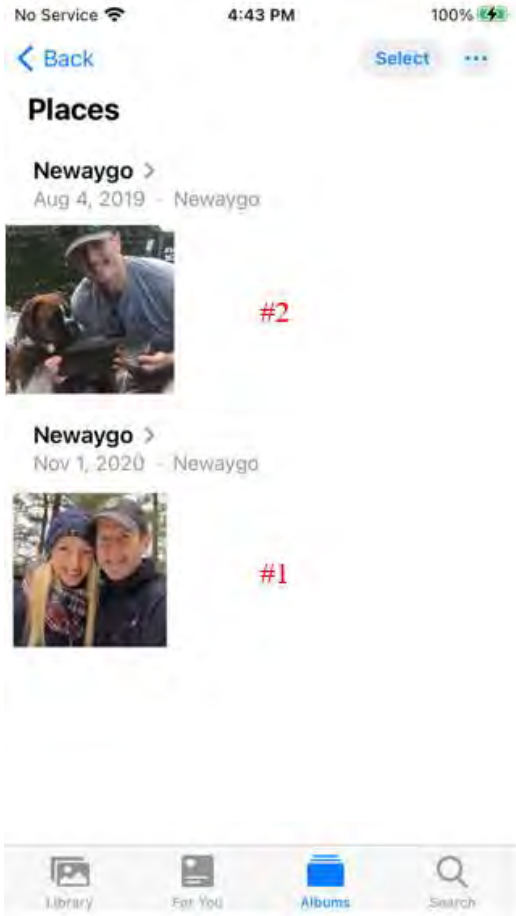


digital files in the first set of digital files and



**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><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

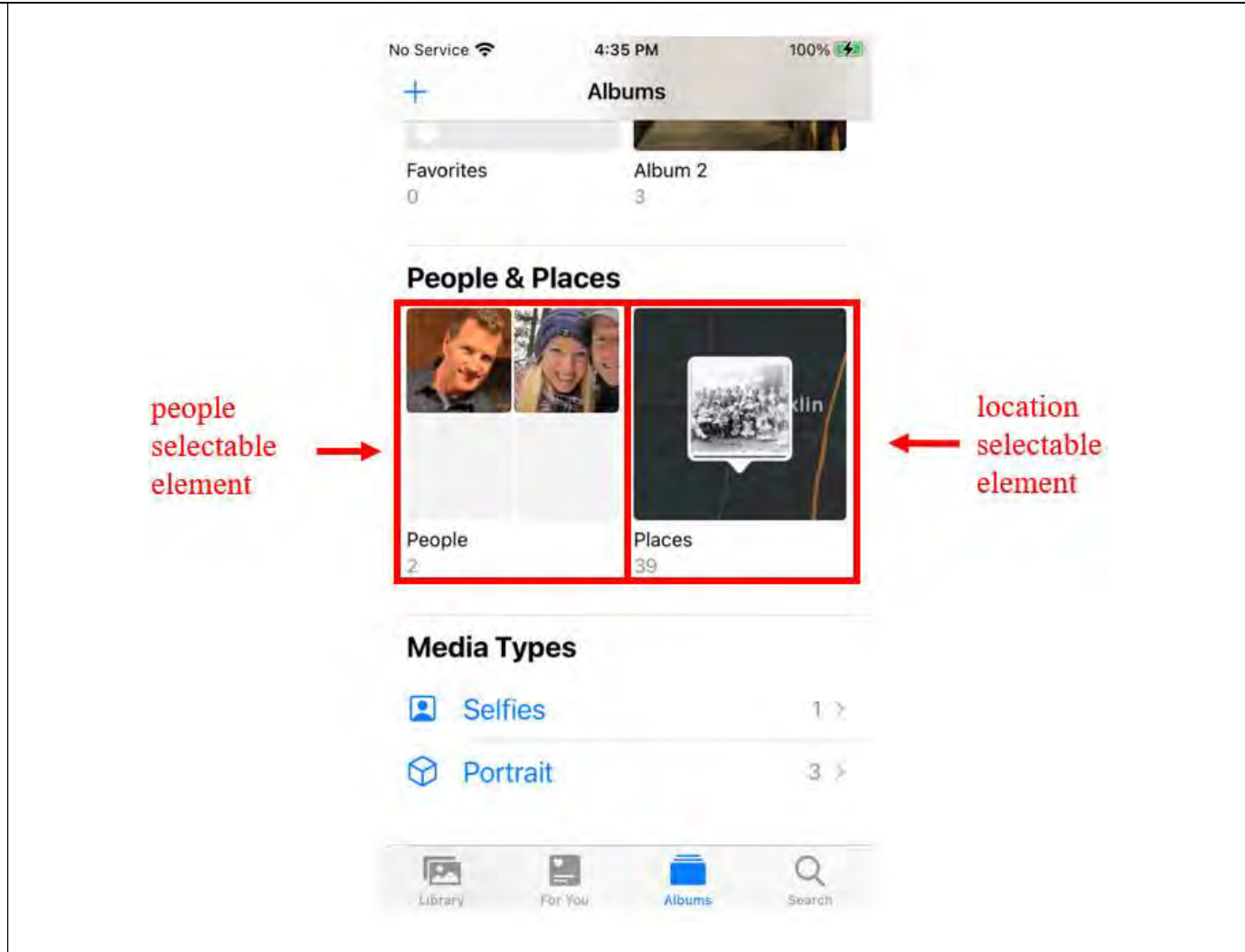


**15[b]** responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second

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.

<p>set of digital files, causing a second digital file to be displayed on the interface.</p>	 <p>The screenshot shows an iPhone gallery interface. At the top, the status bar displays 'No Service', '6:43 PM', and '84%' battery. Below the status bar, the gallery header shows a back arrow, the location 'Brooks Township', the date 'August 5, 2019 12:00 AM', and an 'Edit' button. The main content is a large photo of a man wearing a cap and sunglasses, smiling and holding a large fish. A brown and white dog is sitting next to him. A red arrow points from the text 'second digital file' to the photo. At the bottom of the photo, there are three small thumbnail icons. Below the photo, there are three icons: a share icon, a heart icon, and a trash icon.</p>
<p><b>17[a]</b> The method of claim 1, further comprising, prior to receiving the first input,</p>	<p>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.</p>

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

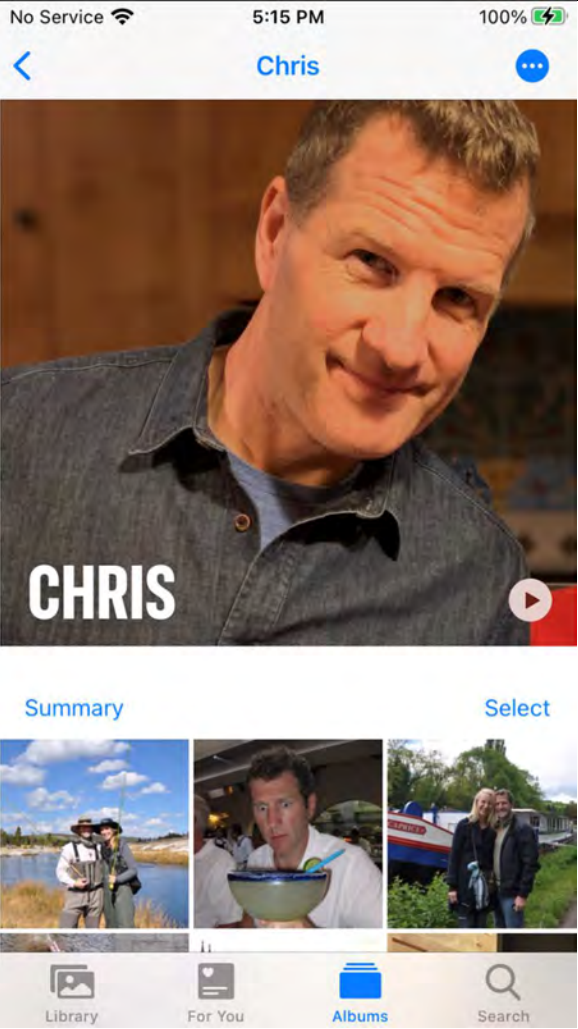
**17[c]** wherein the second input is indicative of a

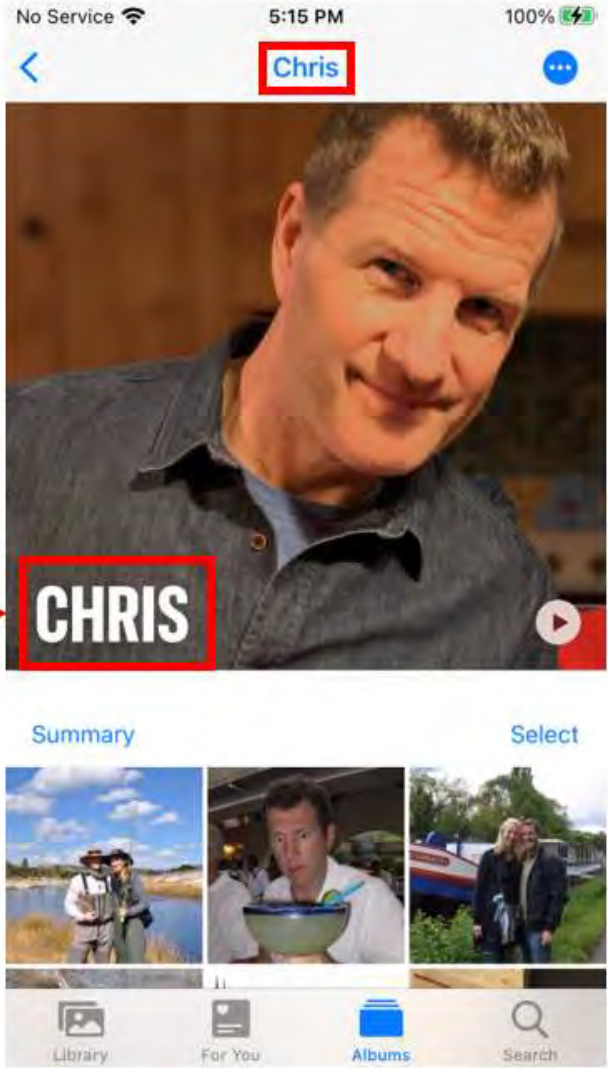
The first input is indicative of a selection of the location selectable element. *See* information for limitation 1[a].

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

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<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>

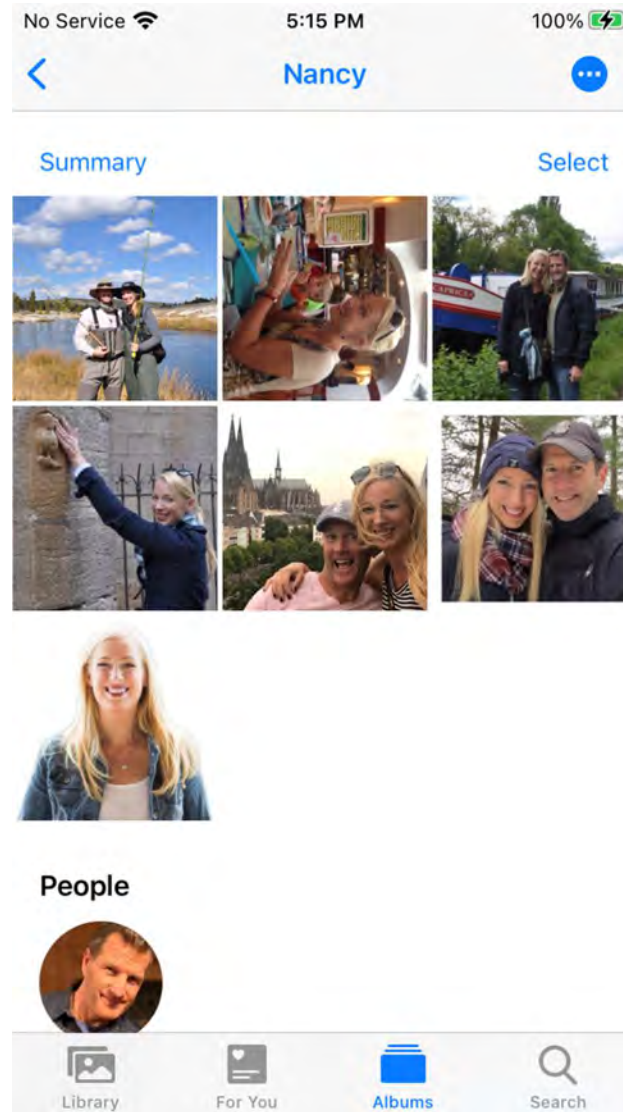
	 <p>The screenshot shows an iPhone interface for a contact named Chris. At the top, the status bar displays 'No Service', '5:15 PM', and '100%' battery. Below the status bar is a navigation bar with a back arrow, the name 'Chris', and a three-dot menu icon. The main content area features a large portrait 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. Above the first two thumbnails is the word 'Summary', and above the third is 'Select'. At the bottom of the screen is a navigation bar with four icons: '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="863 773 1024 808">first name →</p> <p data-bbox="709 997 1083 1170">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 →

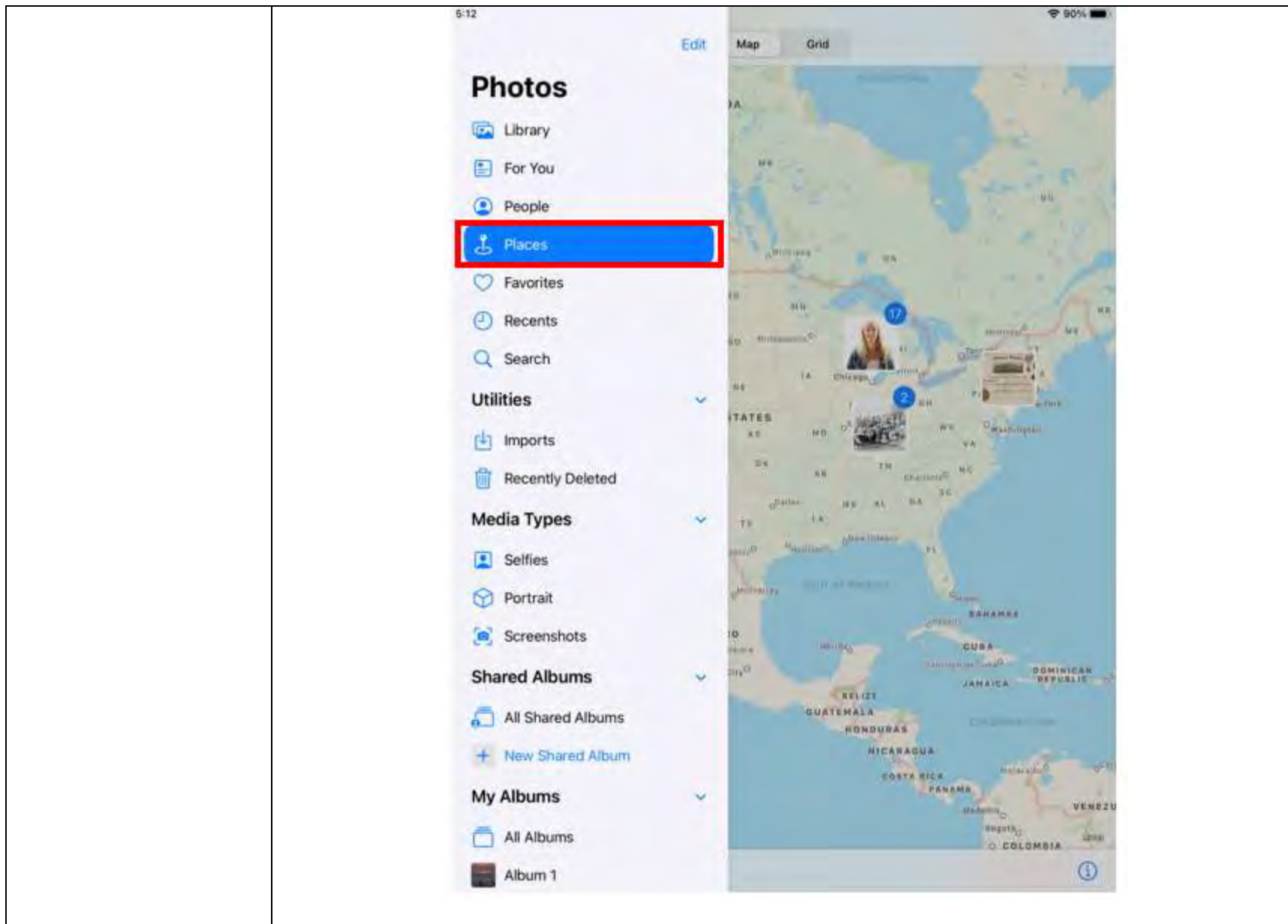


# **Exhibit C.2**

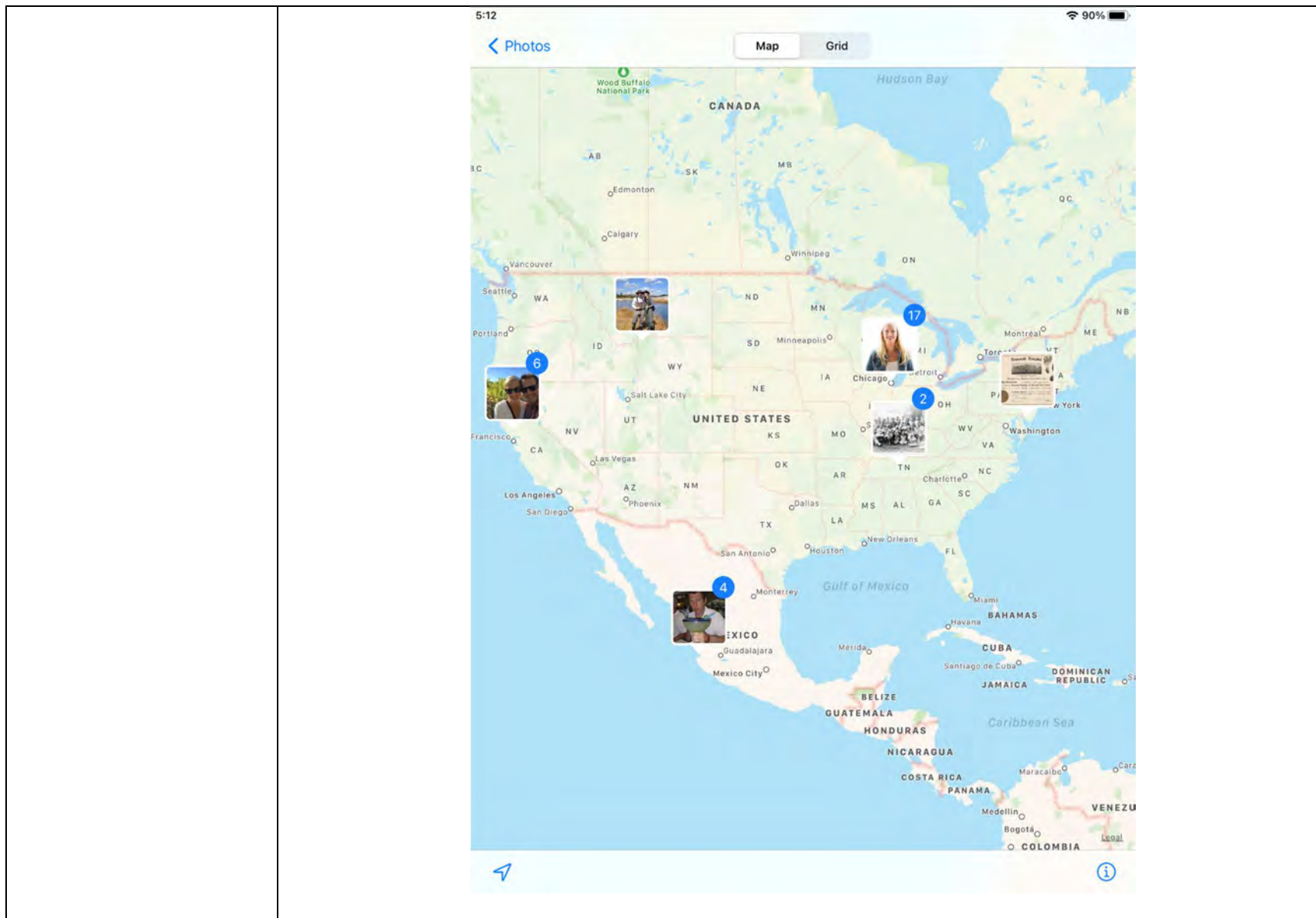
**U.S. Patent No. 10,621,228 – Infringement Claim Chart**

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).

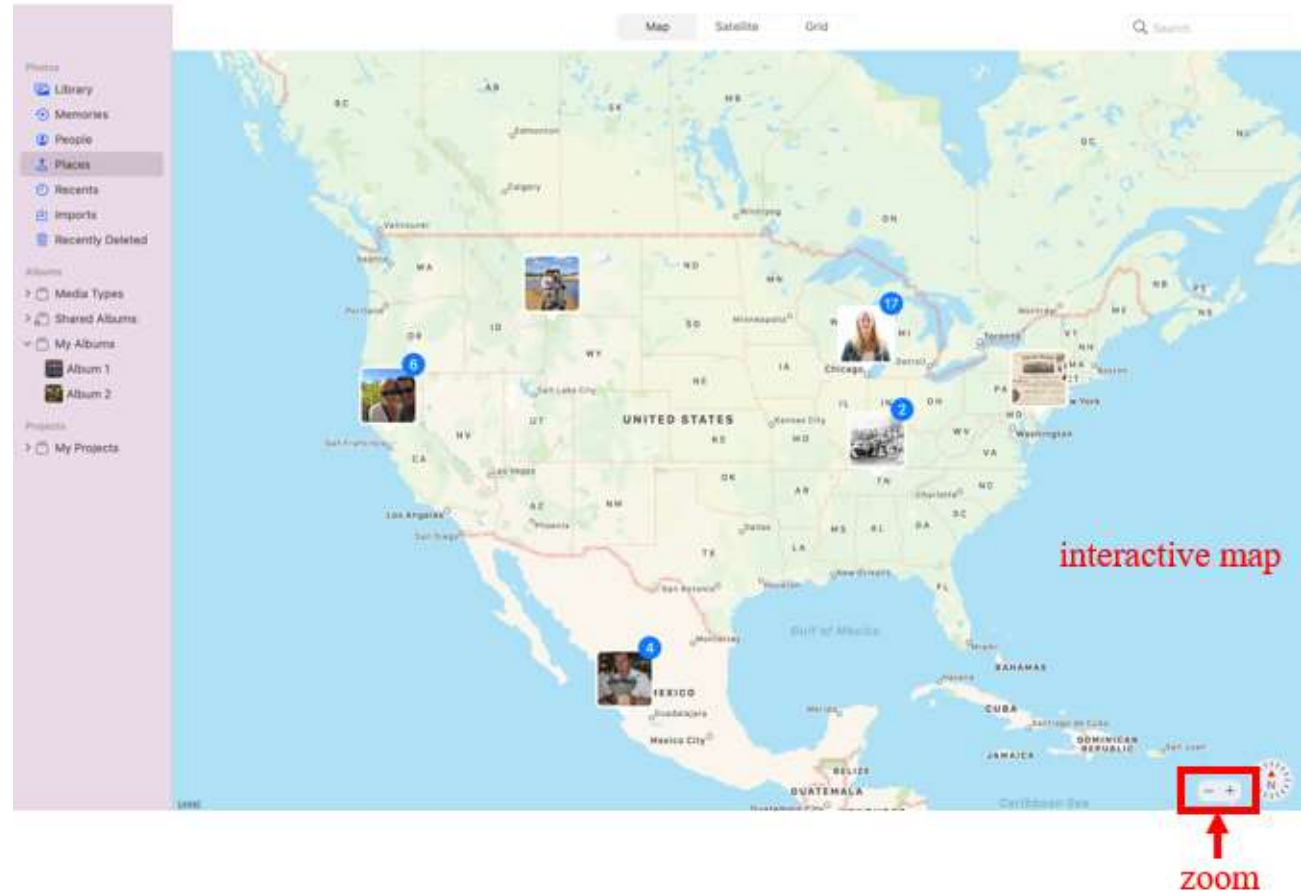


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

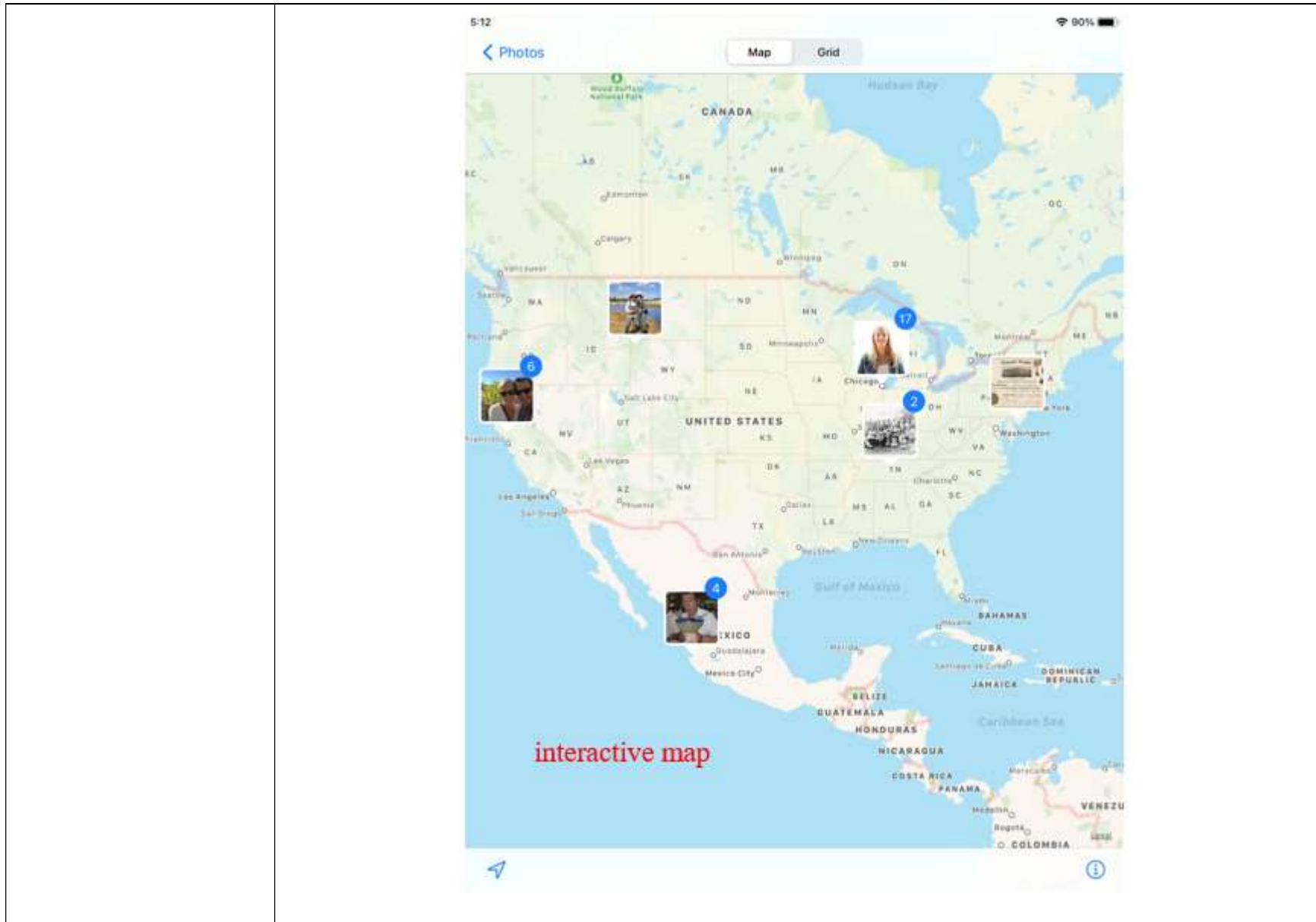


**1[a]i** (i) an interactive map;

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.

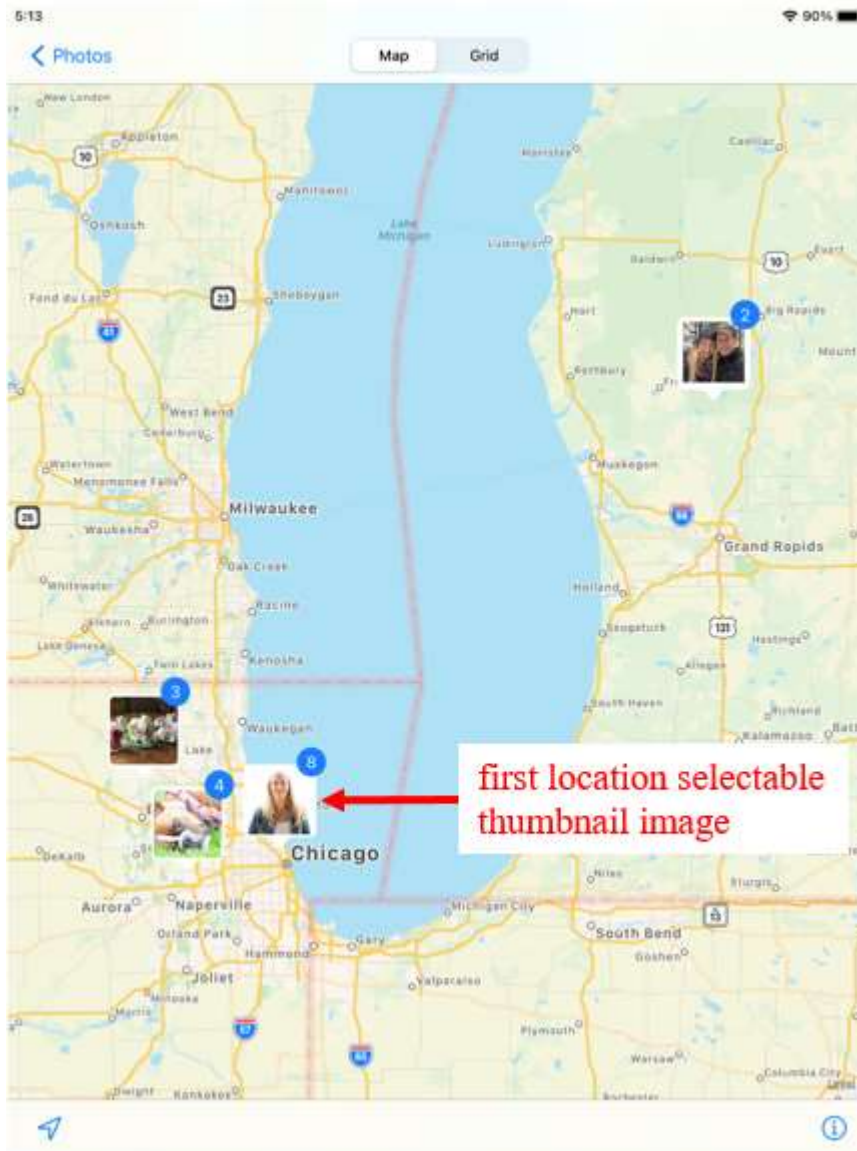


**1[a][ii]** (ii) a first location selectable

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

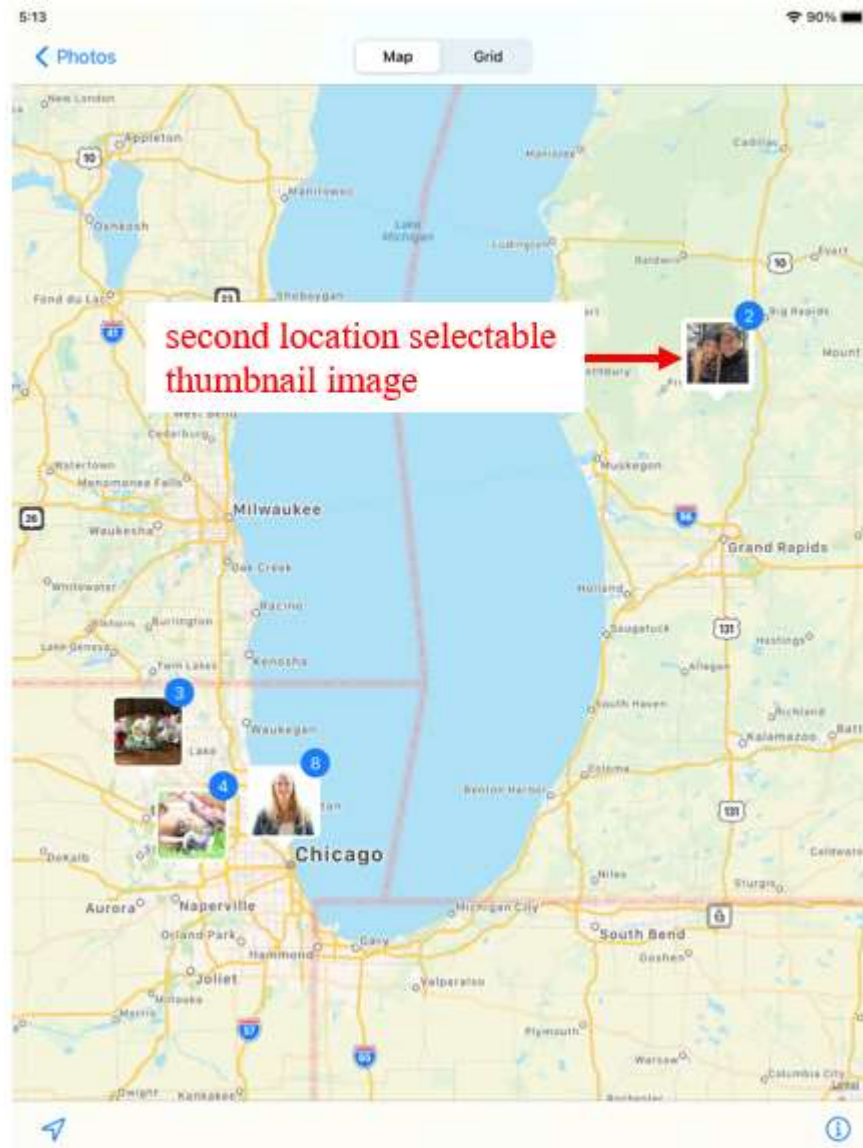


thumbnail image at a first location on the interactive map; and



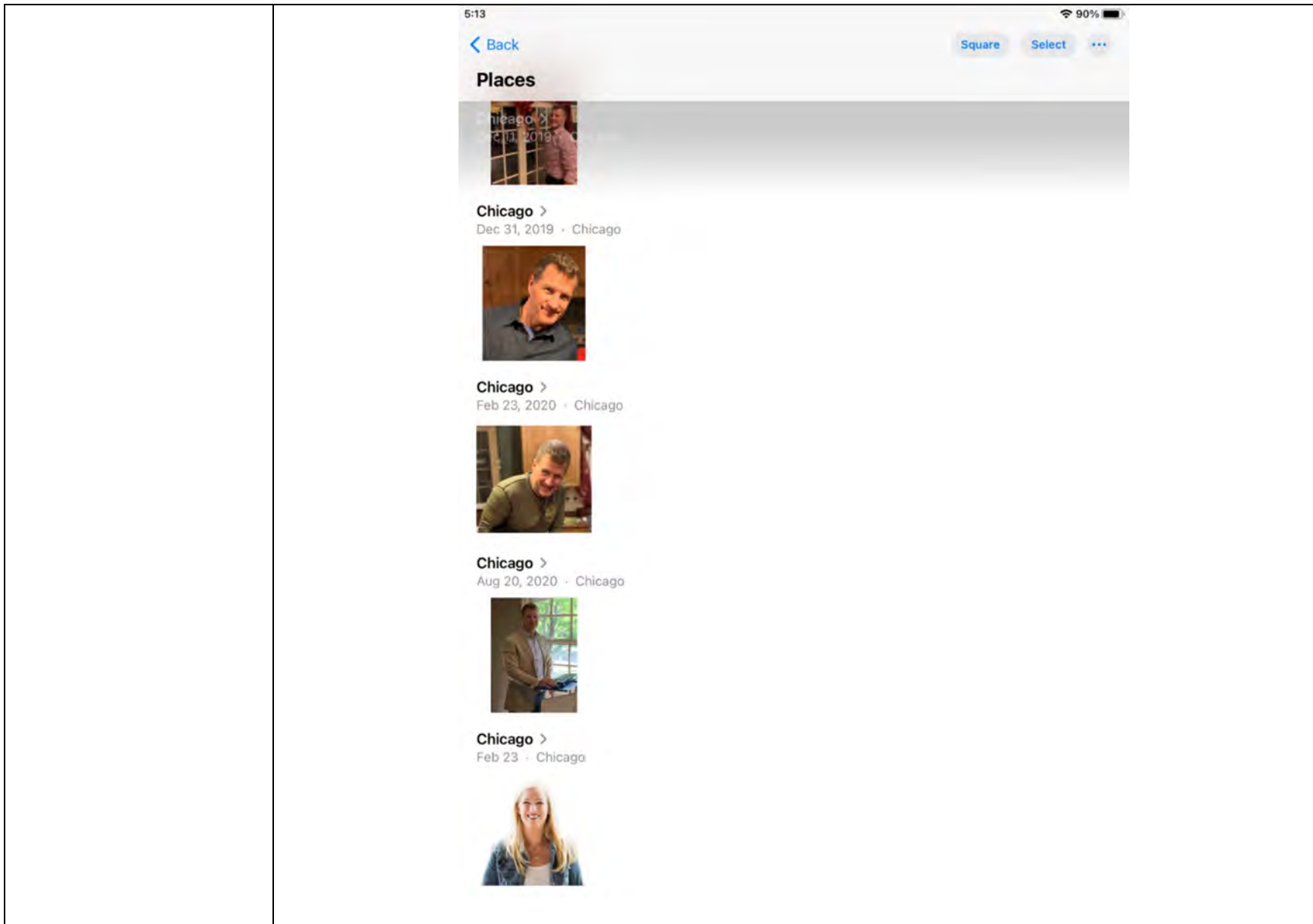
**1[a][iii]** (iii) a second location selectable thumbnail image at a second location on the interactive map;

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



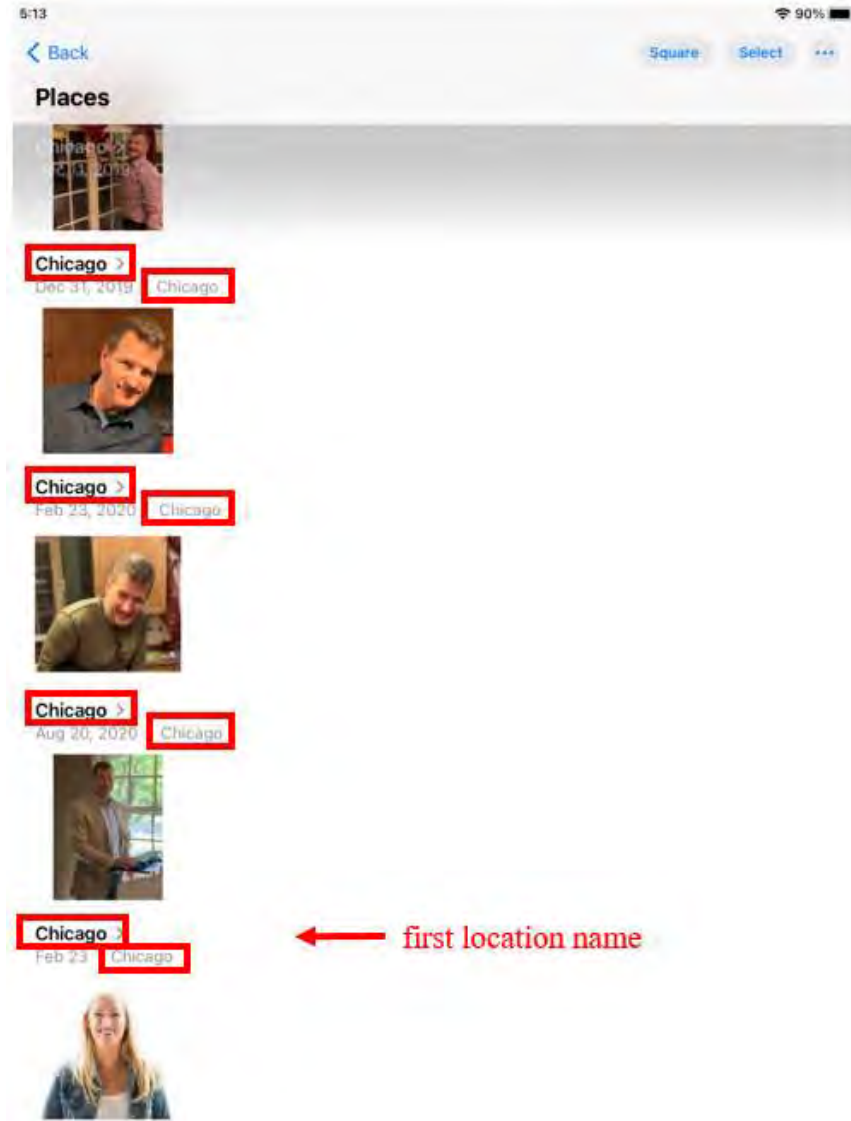
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS

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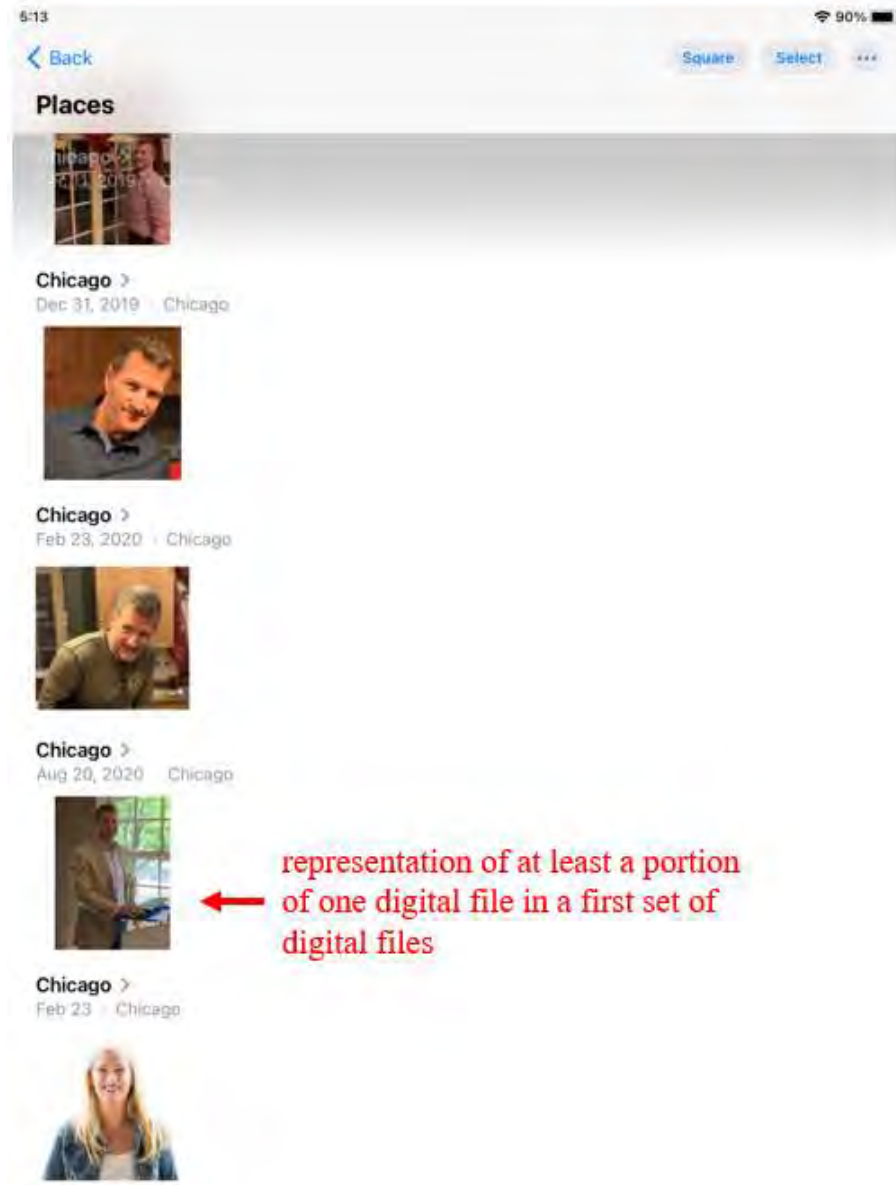
1[b][i] (i) a first location name associated with the first location and

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).
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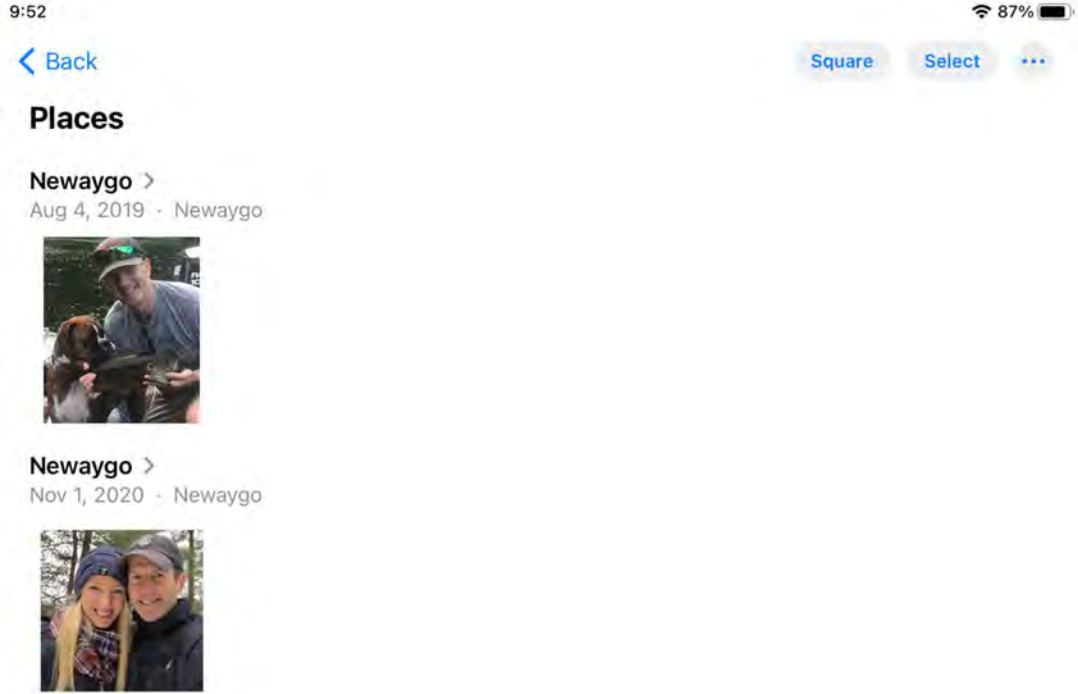
**459029F4-D9FE-4284-94...951B28F9.JPEG**  
JPEG image - 2 MB

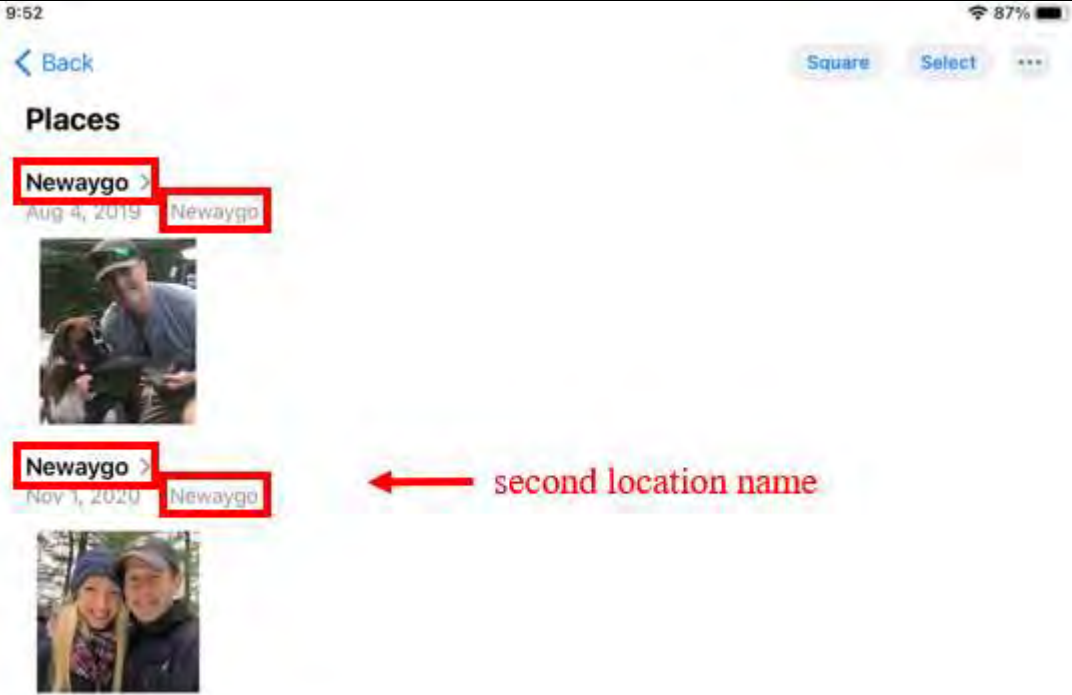
[OPEN](#)




**Information** [Show Less](#)

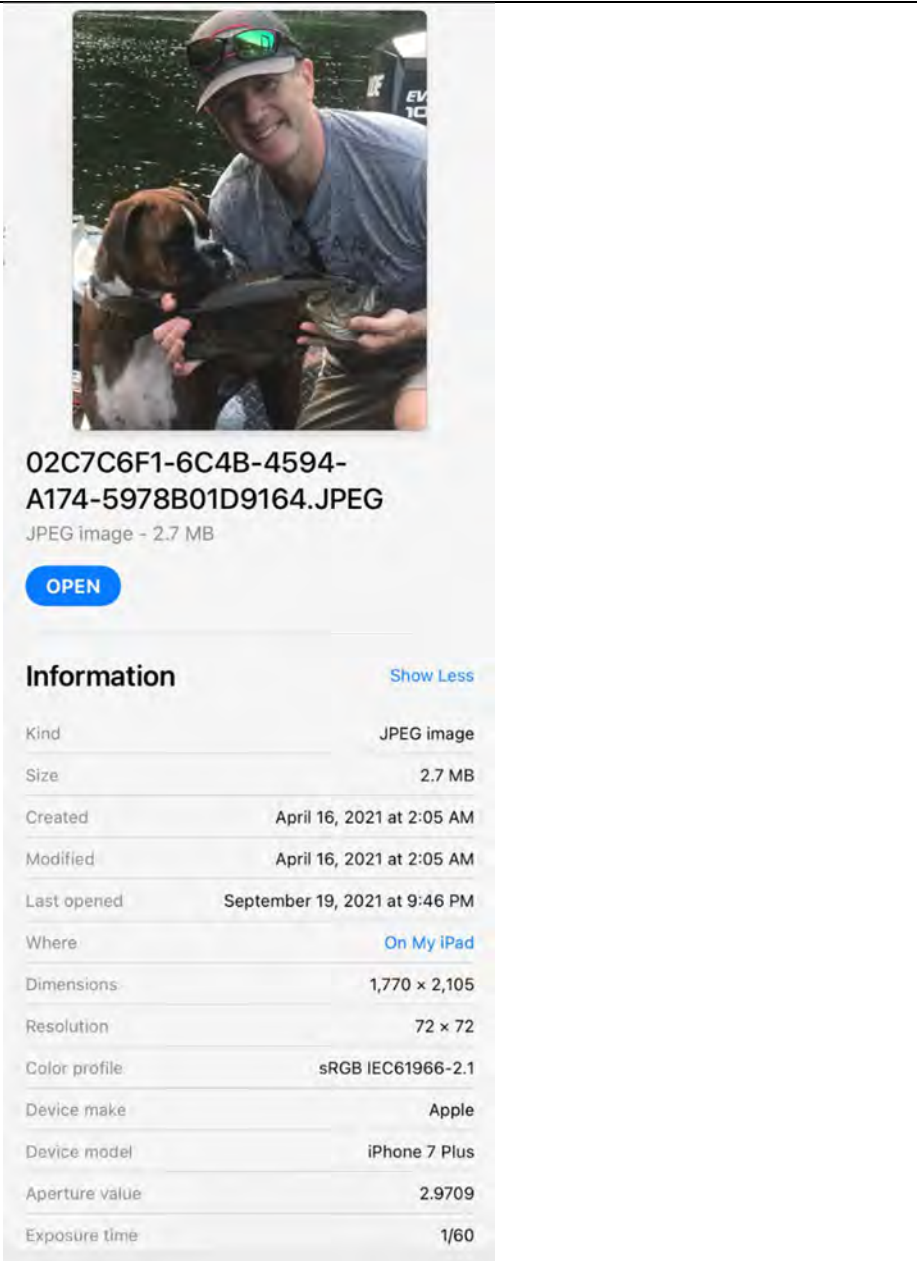
Kind	JPEG image
Size	2 MB
Created	April 16, 2021 at 2:04 AM
Modified	April 16, 2021 at 2:04 AM
Last opened	September 19, 2021 at 9:36 PM
Where	<a href="#">On My iPad</a>
Dimensions	3,024 × 4,032
Resolution	72 × 72
Device make	Apple
Device model	iPhone XR
Lens model	iPhone XR back camera 4.25mm f/1.8
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 status bar displays the time 9:52, signal strength, Wi-Fi, and 87% battery. Below the status bar, there is a blue '&lt; Back' button and three action buttons: 'Square', 'Select', and a three-dot menu. The main content area is titled 'Places' and lists 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.</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>

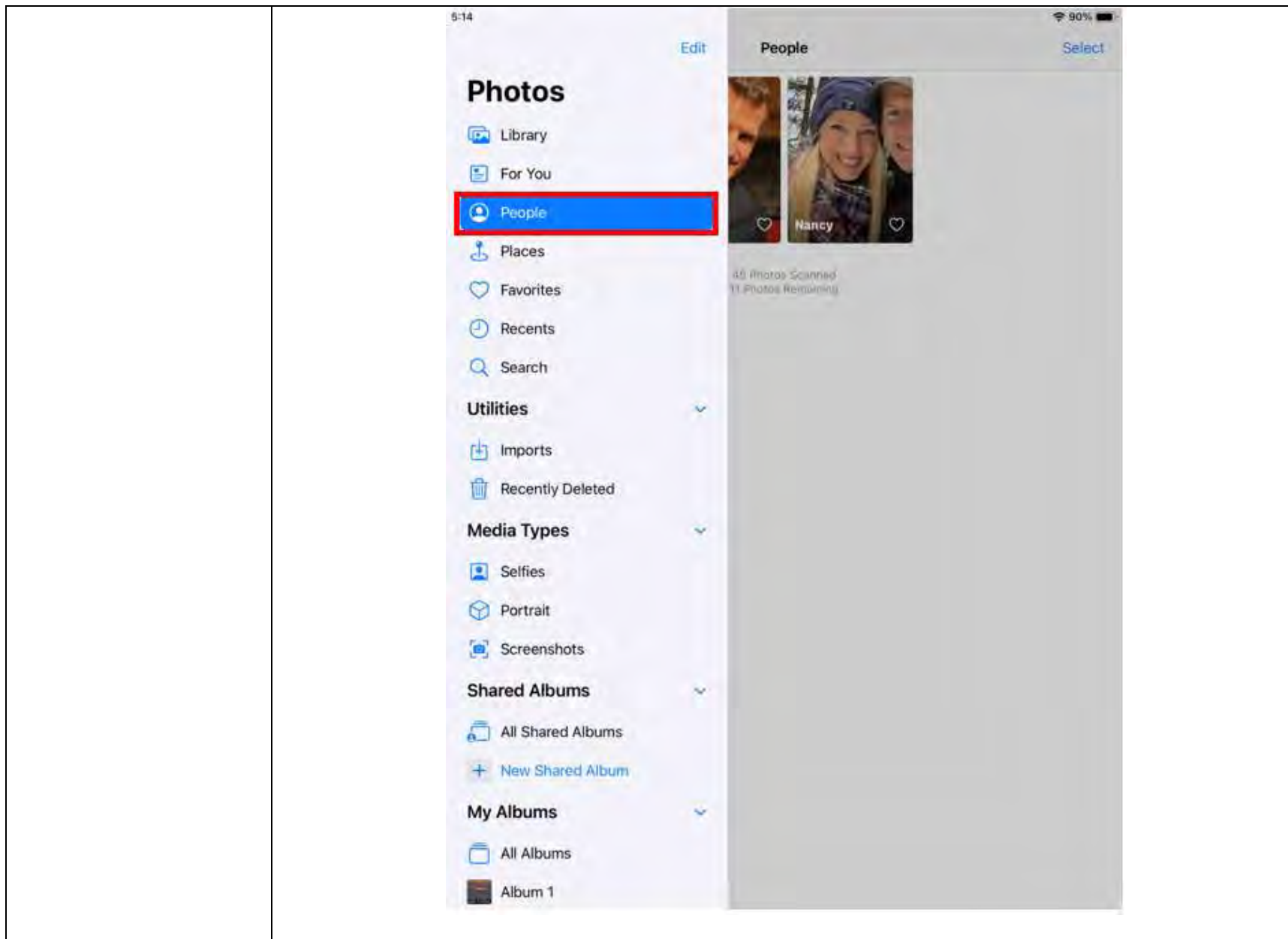
	 <p>The screenshot shows the 'Places' section of an iPadOS app. At the top, there is a 'Back' button and 'Square' and 'Select' options. Below the title 'Places', there are two location entries. The first entry is dated 'Aug 4, 2019' and has a red box around the name 'Newaygo'. Below it is a photo of a man and a dog. The second entry is dated 'Nov 1, 2020' and also has a red box around the name 'Newaygo'. Below it is a photo of a man and a woman. A red arrow points from the text 'second location name' to 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>

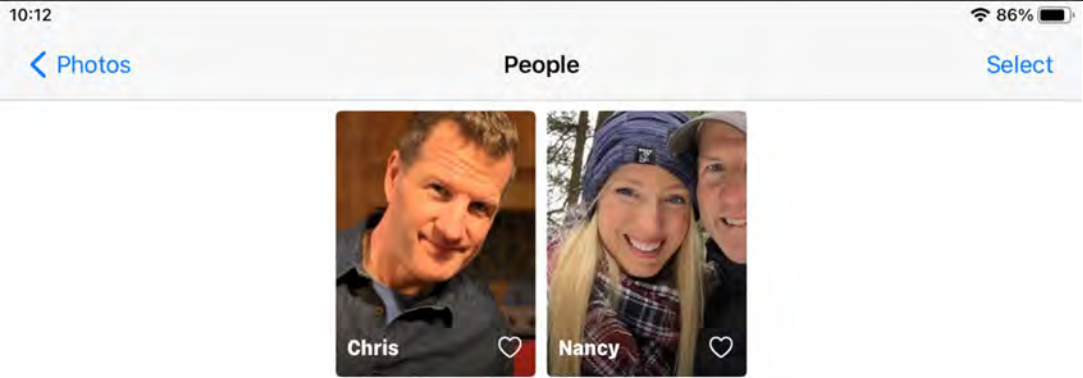
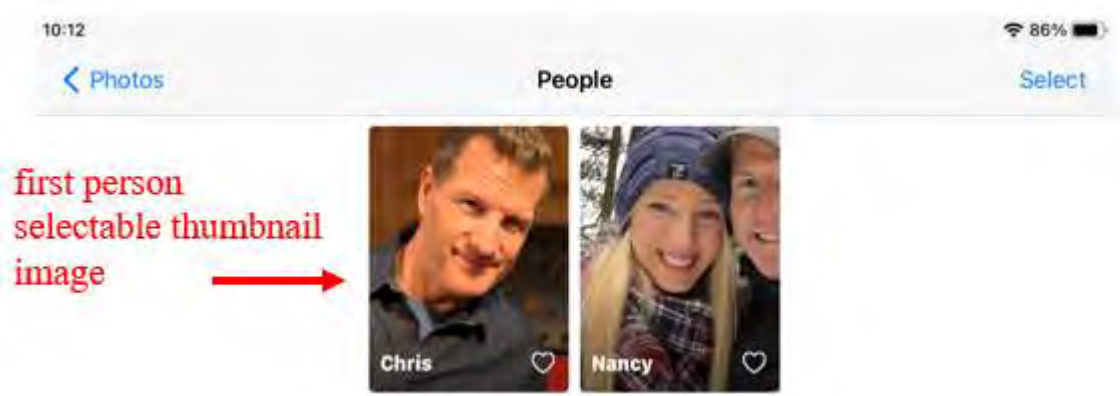
	<p>9:52 <span style="float: right;">87% </span></p> <p><a href="#">← Back</a> <span style="float: right;"><a href="#">Square</a> <a href="#">Select</a> <a href="#">⋮</a></span></p> <p><b>Places</b></p> <p><b>Newaygo</b> &gt; Aug 4, 2019 · Newaygo</p>  <p>← <b>representation of at least a portion of one 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>	

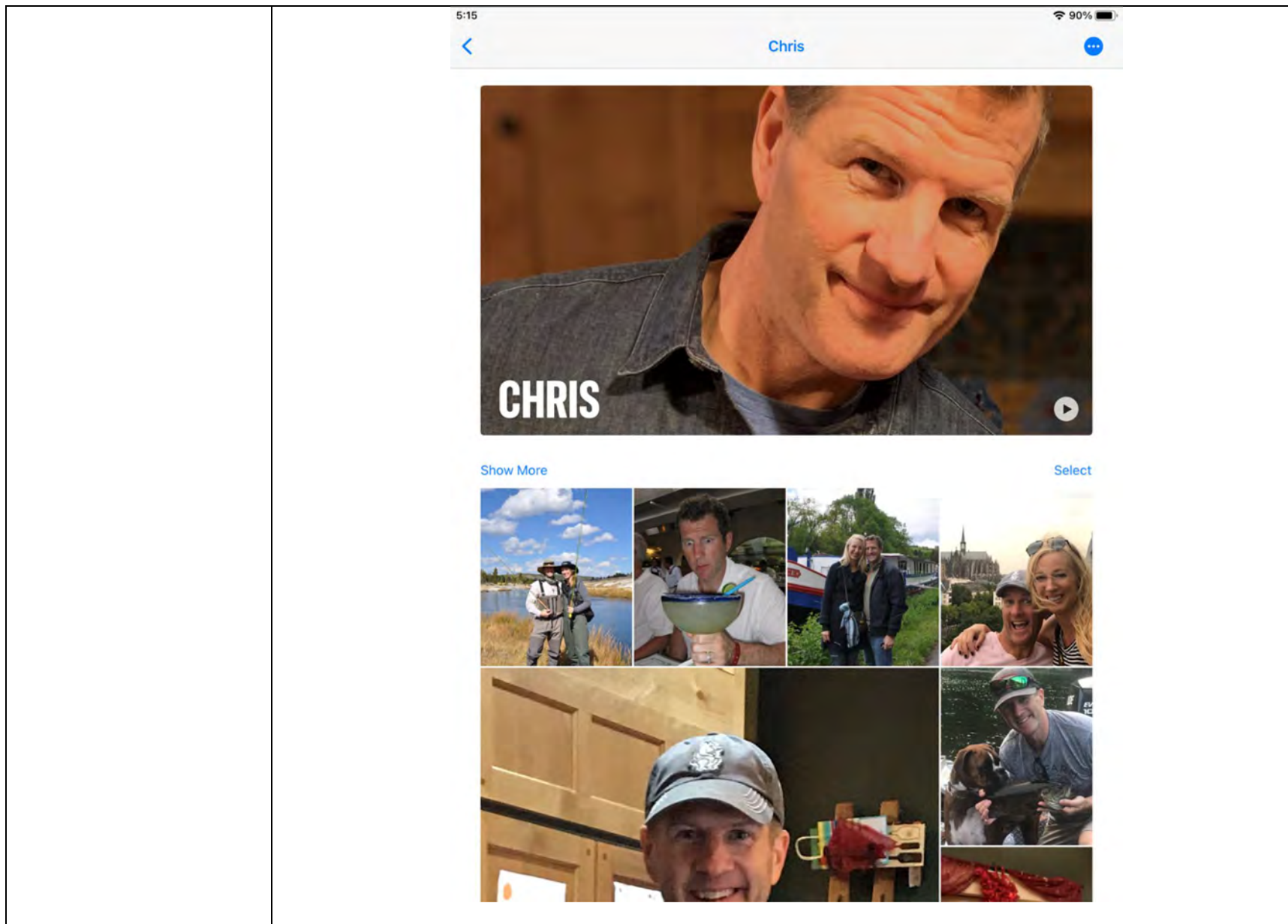
		 <p>The screenshot displays a photo gallery interface on an iPad. At the top, there is a photo of a man wearing a cap and sunglasses, smiling and holding a brown and white dog. Below the photo, the filename "02C7C6F1-6C4B-4594-A174-5978B01D9164.JPEG" is shown, along with the text "JPEG image - 2.7 MB" and a blue "OPEN" button. Below this is an "Information" section with a "Show Less" link. The information is presented in a list format with the following details:</p> <table border="1"><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>On My iPad</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	On My iPad	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	On My iPad																											
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																											

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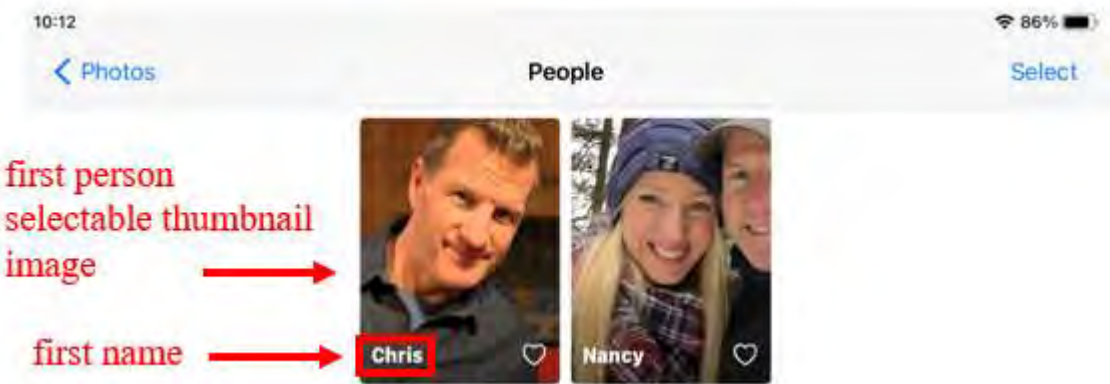
	<p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone 7 Plus (a digital imaging device). The second set of digital files includes digital files associated with the second location.</p>
<p><b>1[d]</b> responsive to a second input that is 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>



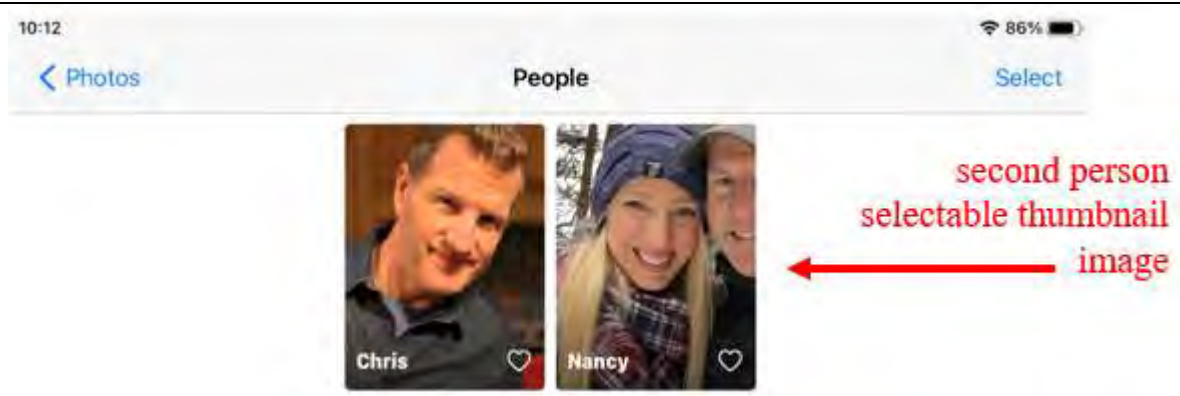
	 <p>A screenshot of the 'People' view in the Photos app. At the top, there is a navigation bar with a back arrow and the word 'Photos' on the left, the word 'People' in the center, and a 'Select' button on the right. Below the navigation bar, there are two portrait-oriented thumbnail images. The first thumbnail shows a man's face, labeled 'Chris' at the bottom with a small heart icon to its right. The second thumbnail shows a woman's face, labeled 'Nancy' at the bottom with a small heart icon to its right.</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>An annotated version of the same screenshot. A red text label 'first person selectable thumbnail image' is positioned to the left of the 'Chris' thumbnail. A red arrow points from this label to the 'Chris' thumbnail.</p> <p>The first person is associated with a third set of digital files including digital photographs and videos.</p>



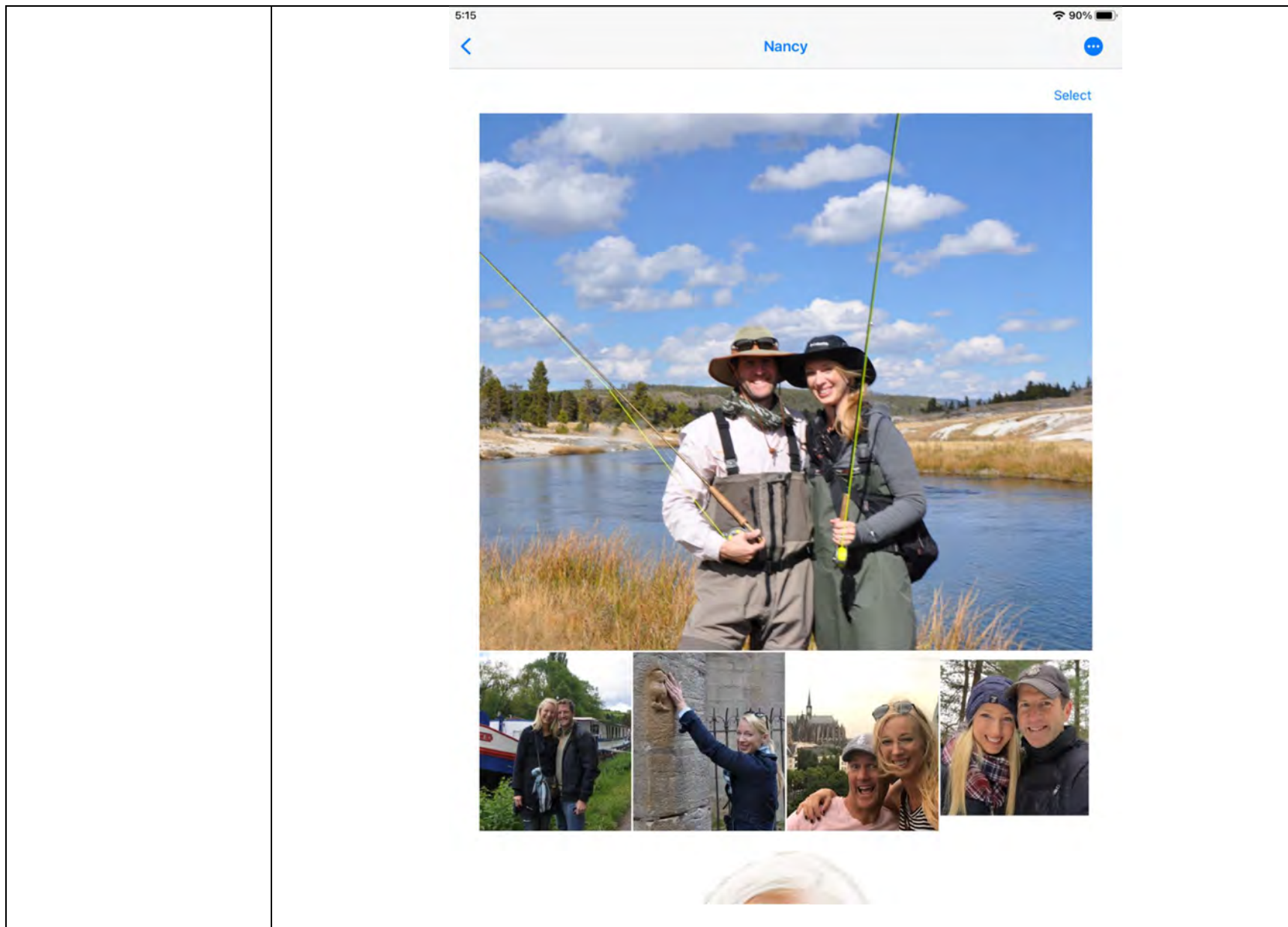


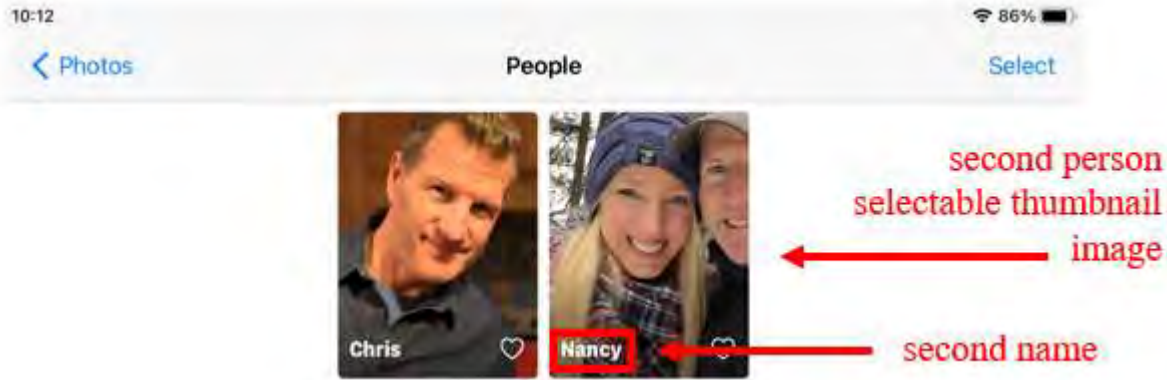
<p><b>1[d][iii]</b> (ii) a first name associated with the first person, the first name being displayed adjacent to the first person selectable thumbnail image;</p>	<p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.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



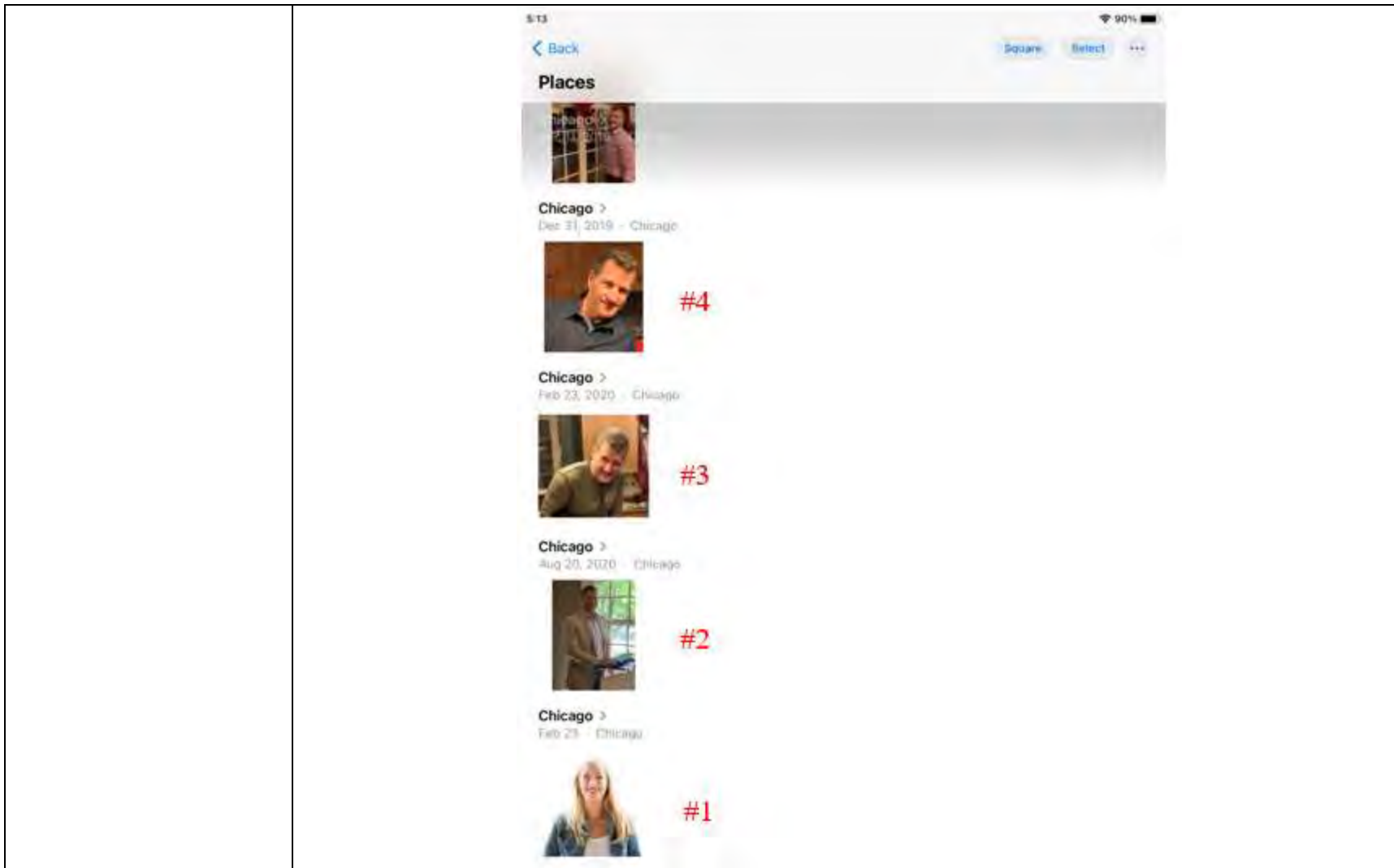
The second person is associated with a fourth set of digital files including digital photographs and videos.

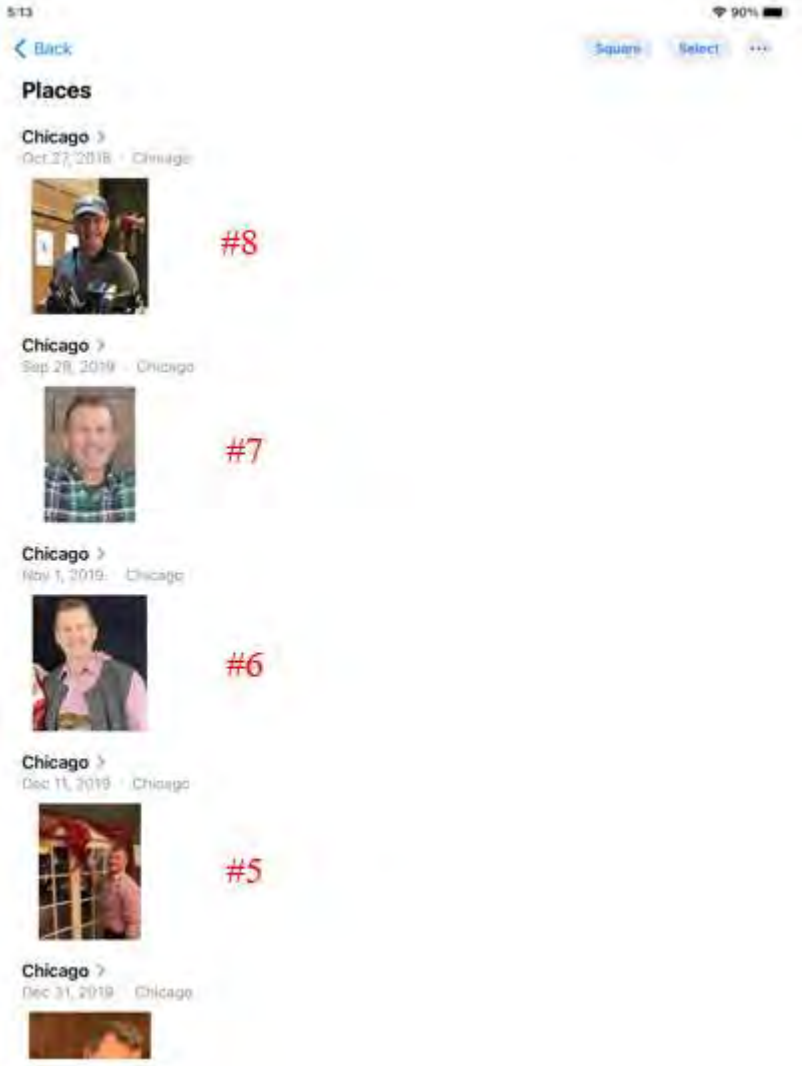



<p><b>1[d][iv]</b> (iv) a second name associated with the second person, the second name being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second 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 setting. Marker 4 is at Lake Waukegan with a thumbnail of a pig. Marker 8 is at Chicago 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>

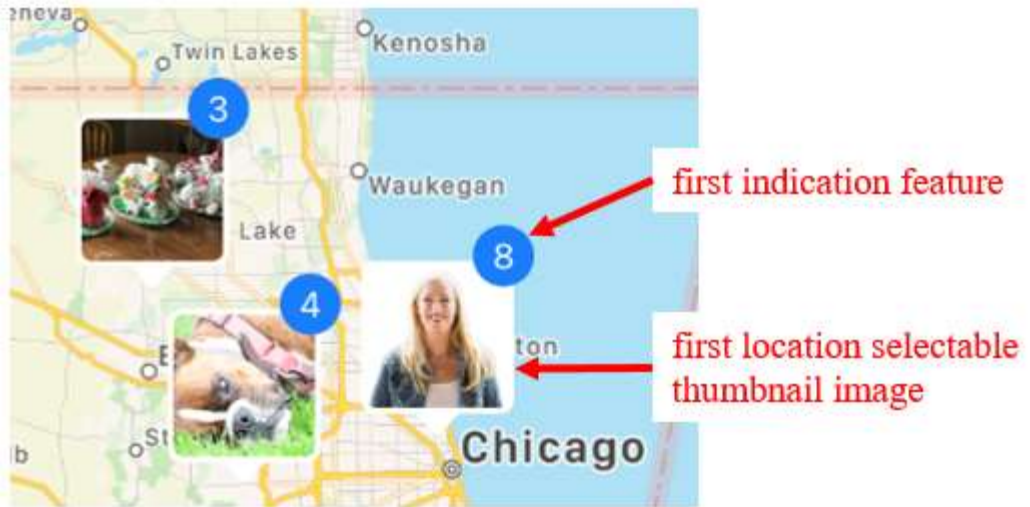
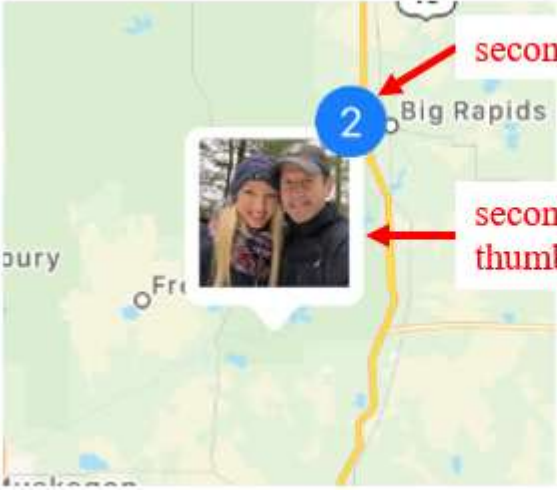
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	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and a '90%' battery indicator. Below the title 'Places', the location 'Chicago' is listed with a chevron icon. Five location thumbnails are displayed, each with a date and the word 'Chicago' below it. Red annotations are placed to the right of each thumbnail: '#8' next to the first thumbnail (dated Oct 27, 2018), '#7' next to the second (Sep 28, 2018), '#6' next to the third (Nov 1, 2018), and '#5' next to the fourth (Dec 11, 2018). The fifth thumbnail (dated Dec 31, 2018) is partially visible at the bottom.</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>The image shows a map of the Chicago area with three location markers. Marker 3 is at Twin Lakes and shows a thumbnail of a dining table. Marker 4 is at Lake Waukegan and shows a thumbnail of a pig. Marker 8 is at Chicago and shows a thumbnail of a woman. Red arrows point from text labels to markers 8 and 4.</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>



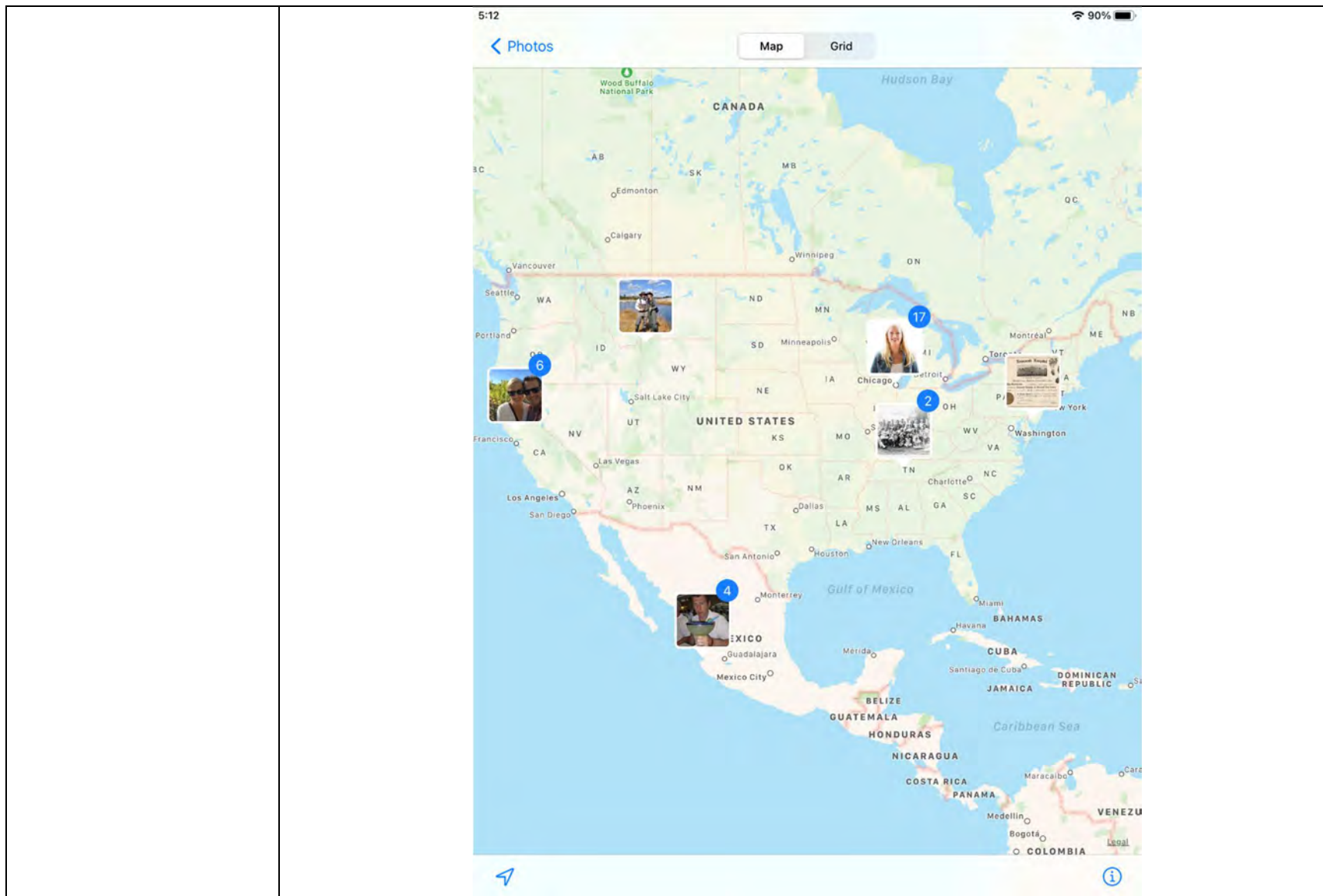
	 <p>A map view showing several locations. Three location-selectable thumbnail images are overlaid on the map. Callout 3 points to a thumbnail of a dining table. Callout 4 points to a thumbnail of a pig. Callout 8 points to a thumbnail of a woman's face. Red arrows point from callout 8 to a text box labeled 'first indication feature' and from callout 4 to a text box labeled '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 location. A location-selectable thumbnail image of a couple is overlaid on the map. Callout 2 points to a blue circle on the map labeled '2', which is identified as a 'second indication feature'. A red arrow points from the thumbnail image to a text box labeled '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. Under the heading 'Places', there are two photo thumbnails from a location named 'Newygo'. The first thumbnail, dated 'Aug 4, 2019', shows a man and a dog, with a red '#2' label to its right. The second thumbnail, dated 'Nov 1, 2020', shows a man and a woman, with a red '#1' label to its right.</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>

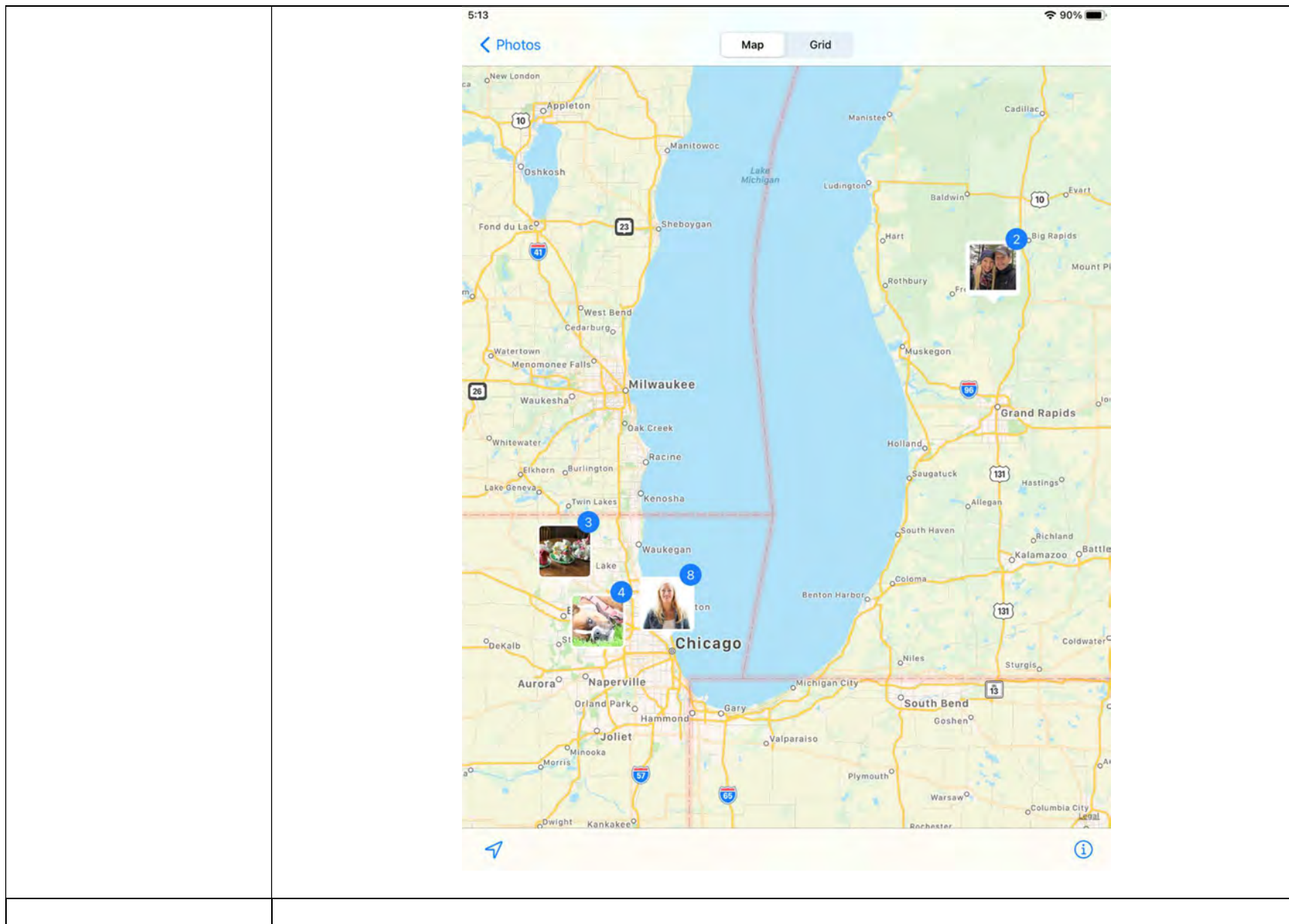
	
<p>7. The method of claim 5, wherein the second indication feature includes a second number indicative of the number of digital files in the second set of digital files.</p>	<p>The second indication feature includes a second number indicative of the number of digital files in the second set of digital 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>

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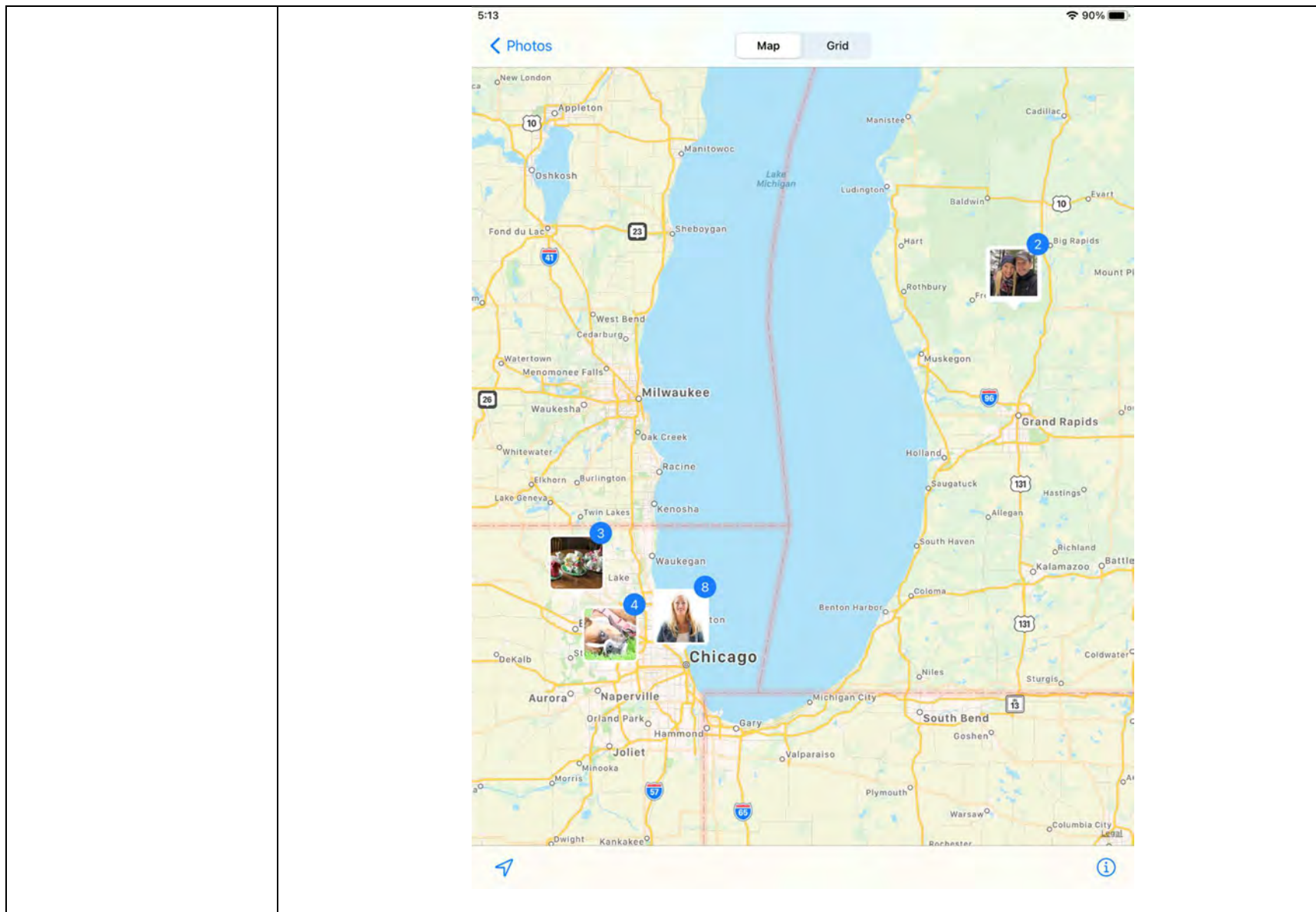


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple iPadOS



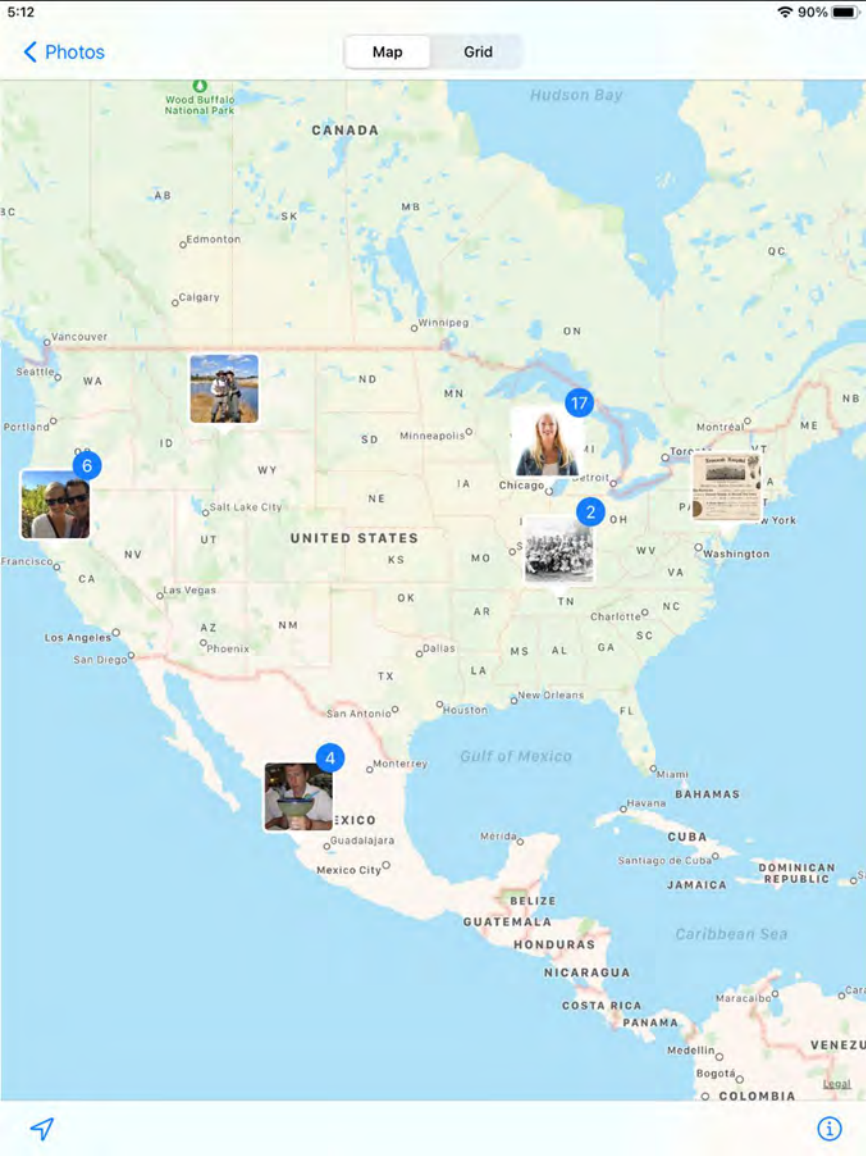
<p>9. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, modifying the first indication feature.</p>	<p>Subsequent to the map view being displayed on the interface, iPadOS 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>
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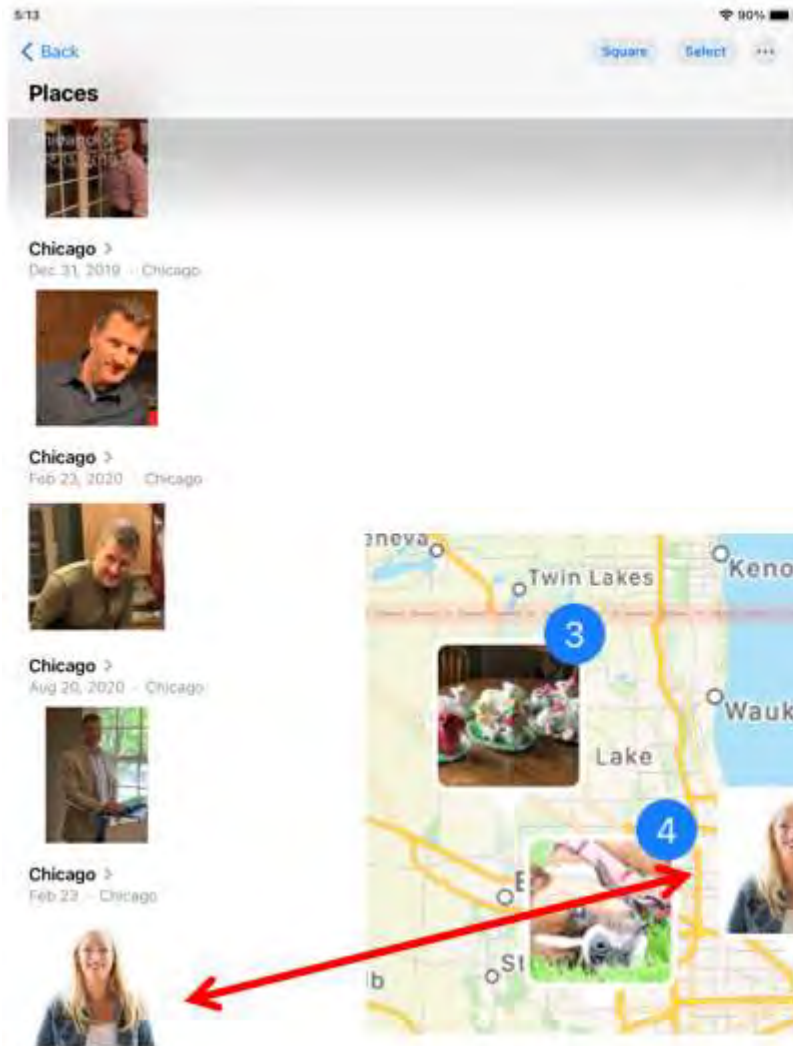


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<p><b>12[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>

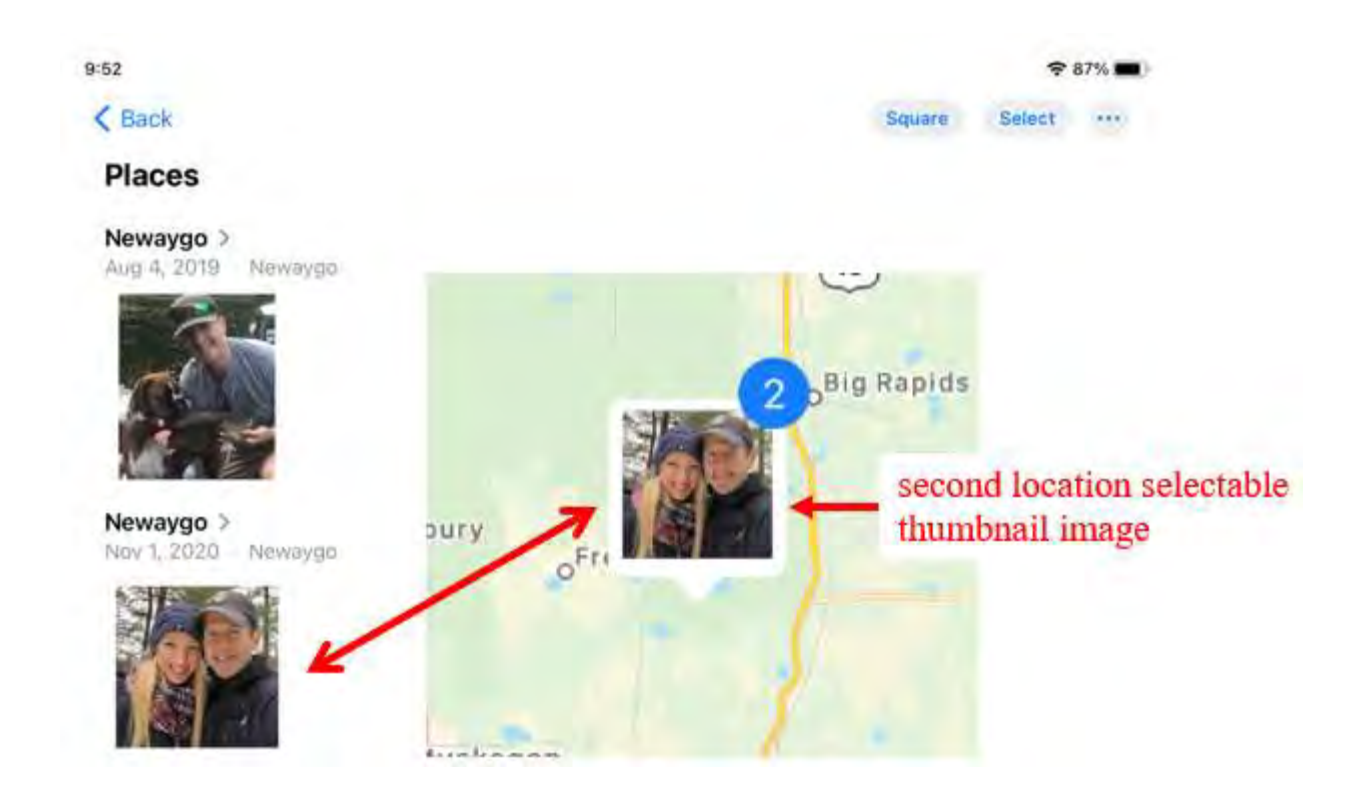
**12[a]** the first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files, and

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

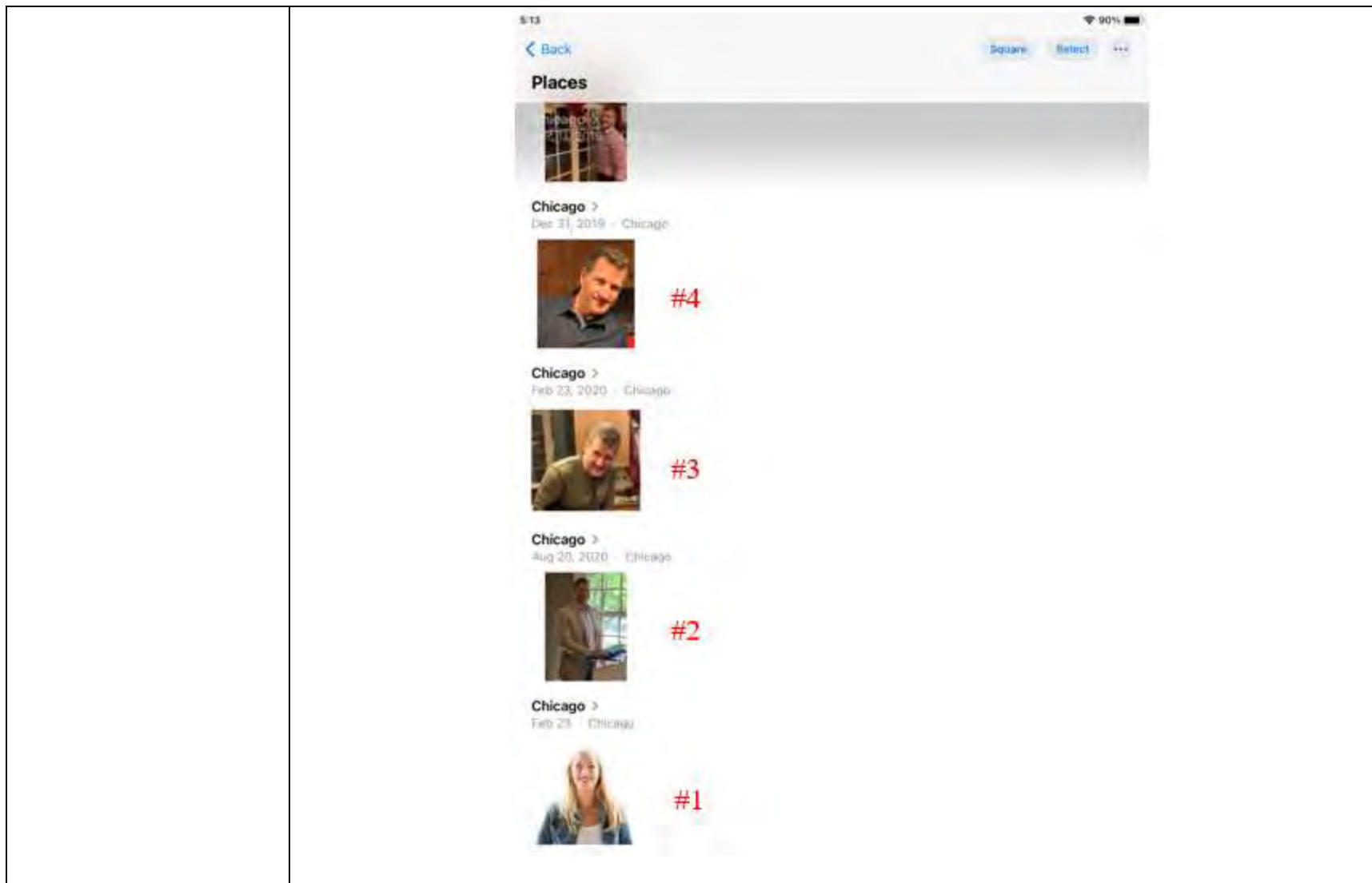


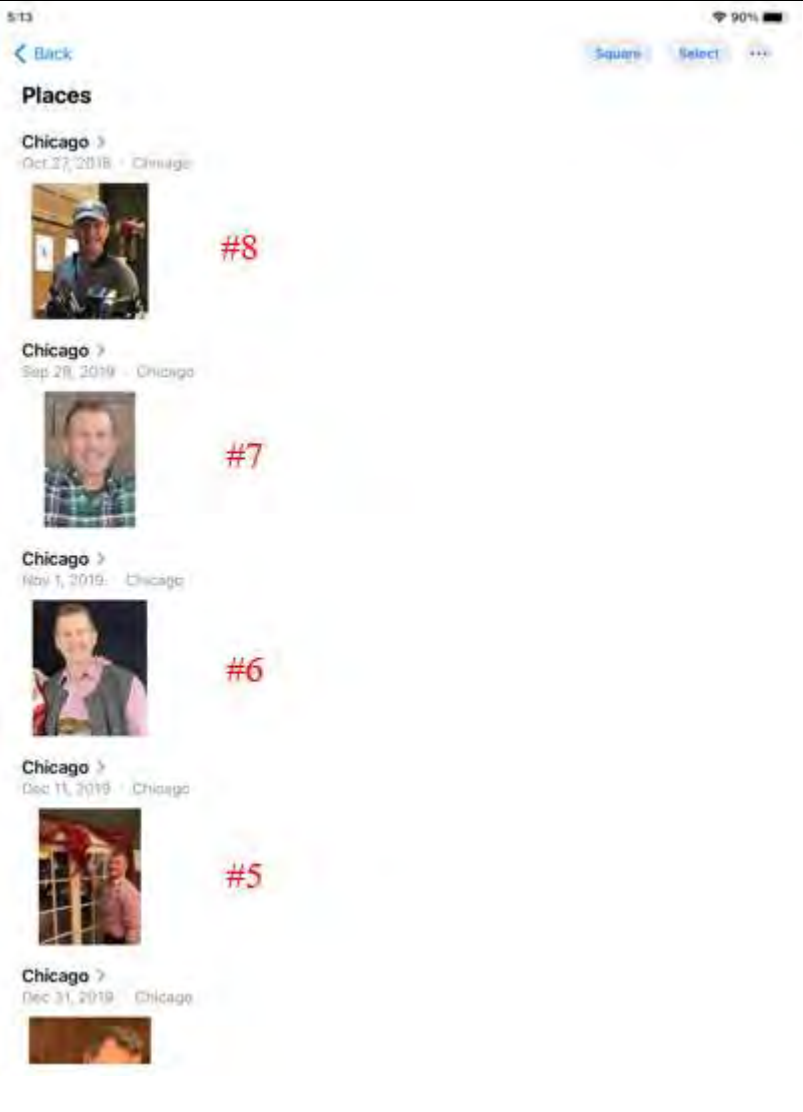
**12[b]** wherein the second location

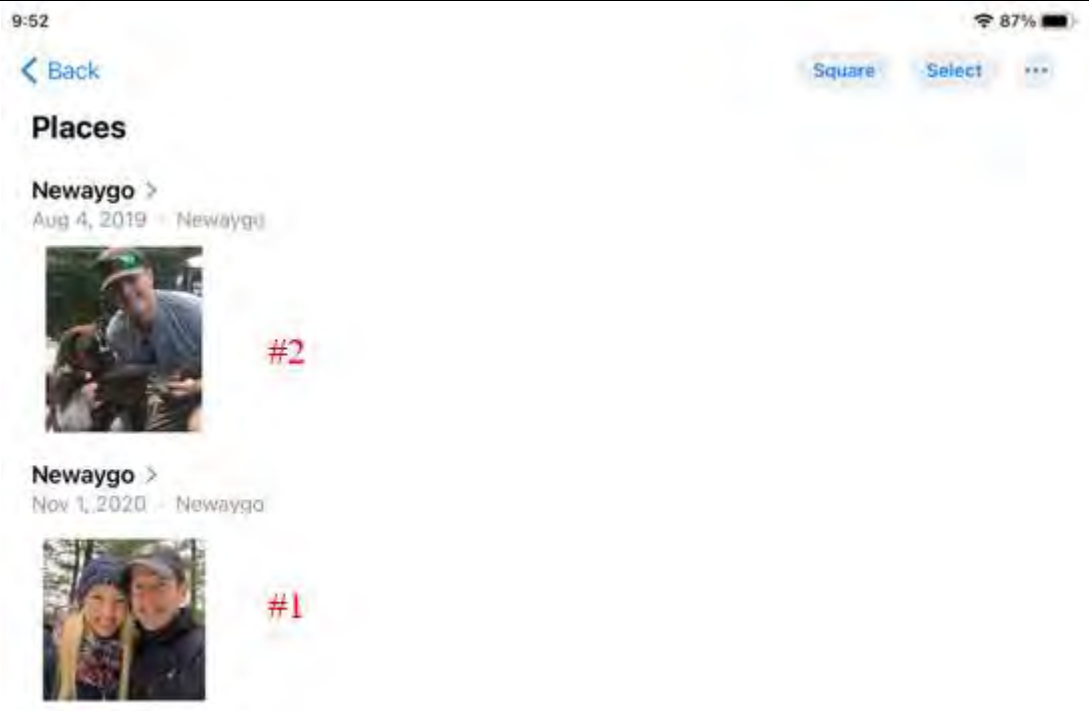
The second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

<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 back arrow are buttons for 'Square', 'Select', and a three-dot menu. The main content is titled 'Places' and shows two photo thumbnails from 'Newygo'. The first thumbnail is dated 'Aug 4, 2019' and shows a man with a dog. The second thumbnail is dated 'Nov 1, 2020' and shows a couple. A map view is overlaid on the right, showing a location marked with a blue circle containing the number '2' and labeled 'Big Rapids'. A red arrow points from the 'Nov 1, 2020' thumbnail to this location on the map. Another red arrow points from a text box labeled 'second location selectable thumbnail image' to the same location on the map.</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>

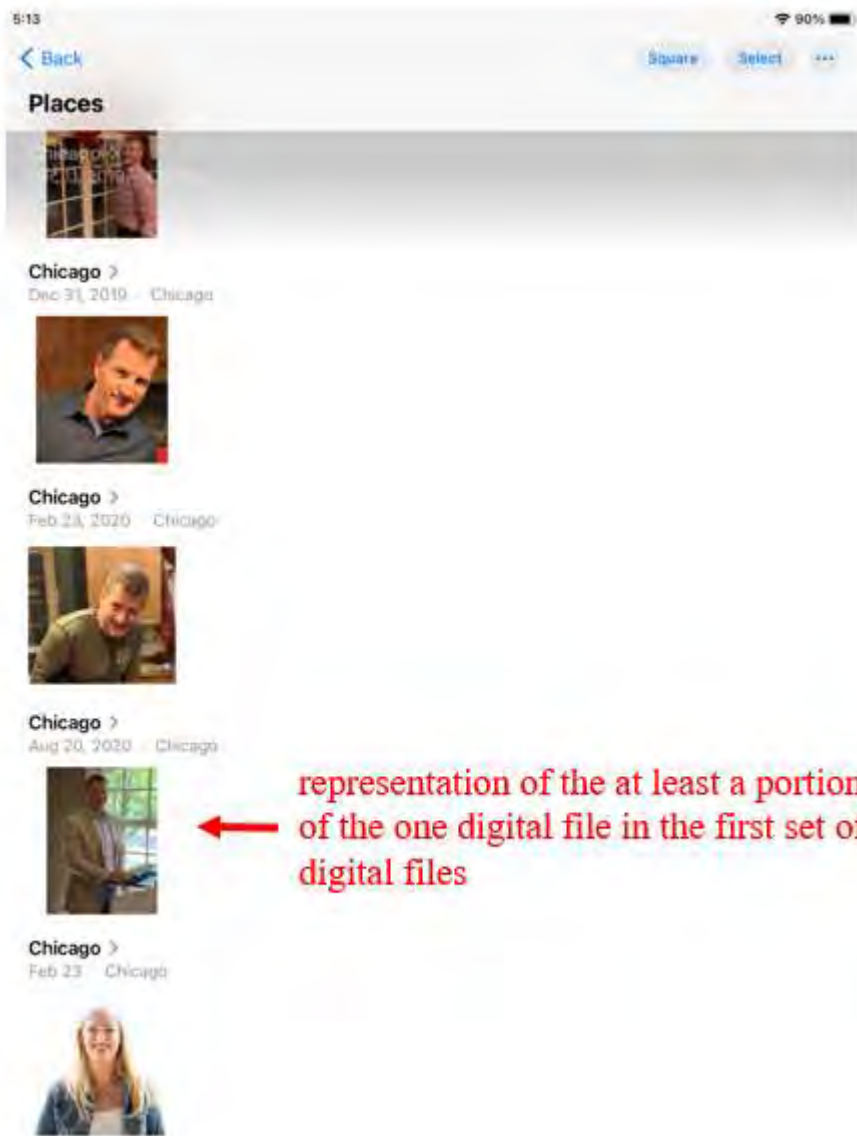
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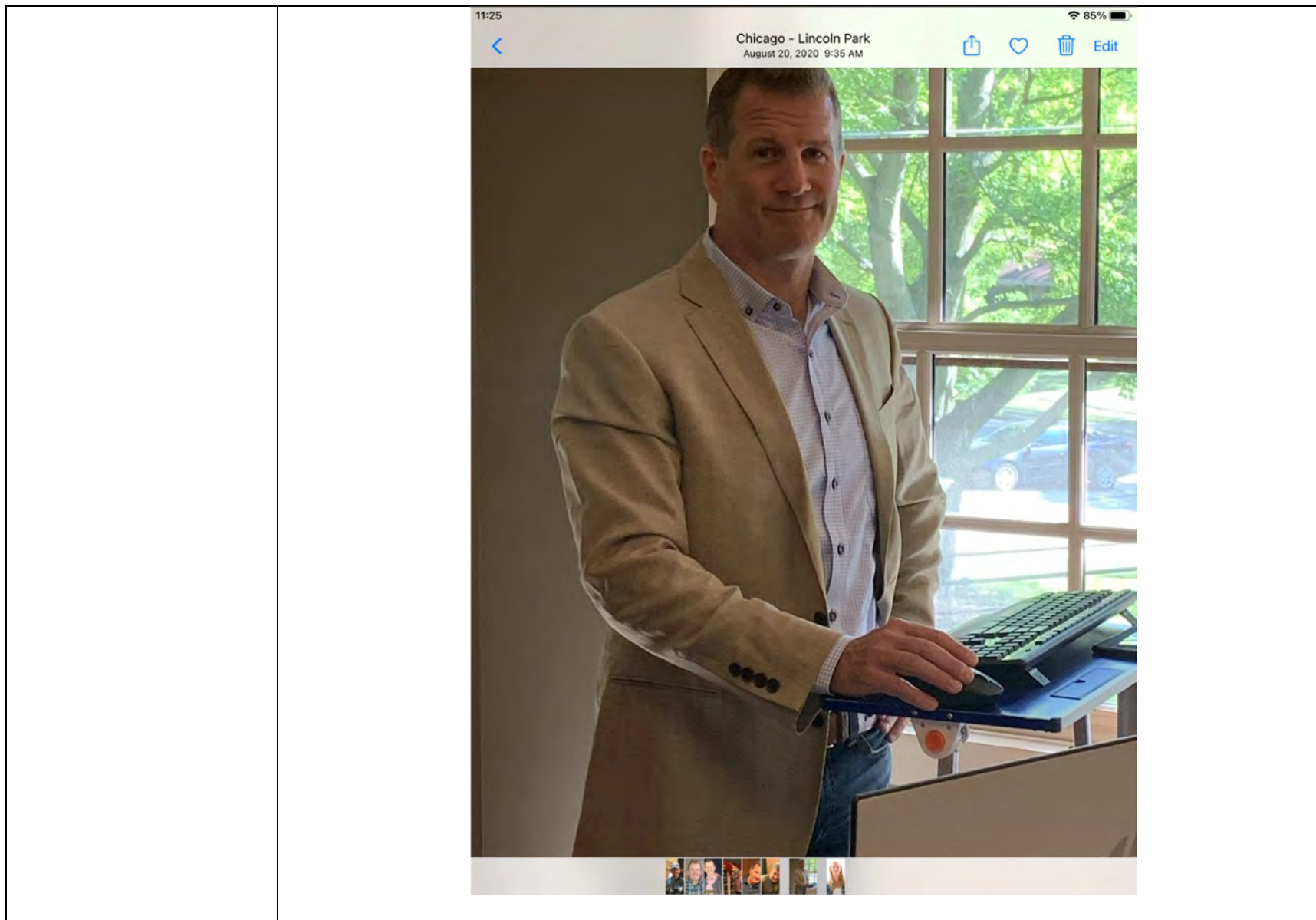
	 <p>The screenshot shows an iPadOS interface with a 'Places' section. Under the heading 'Chicago', there is a list of photos. The photos are annotated with red numbers: #8, #7, #6, and #5. The interface includes a 'Back' button at the top left, 'Square' and 'Select' buttons at the top right, and a status bar at the very top showing the time 5:13 and 90% battery. The photos are arranged vertically, with the most recent at the top.</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>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 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



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






**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.

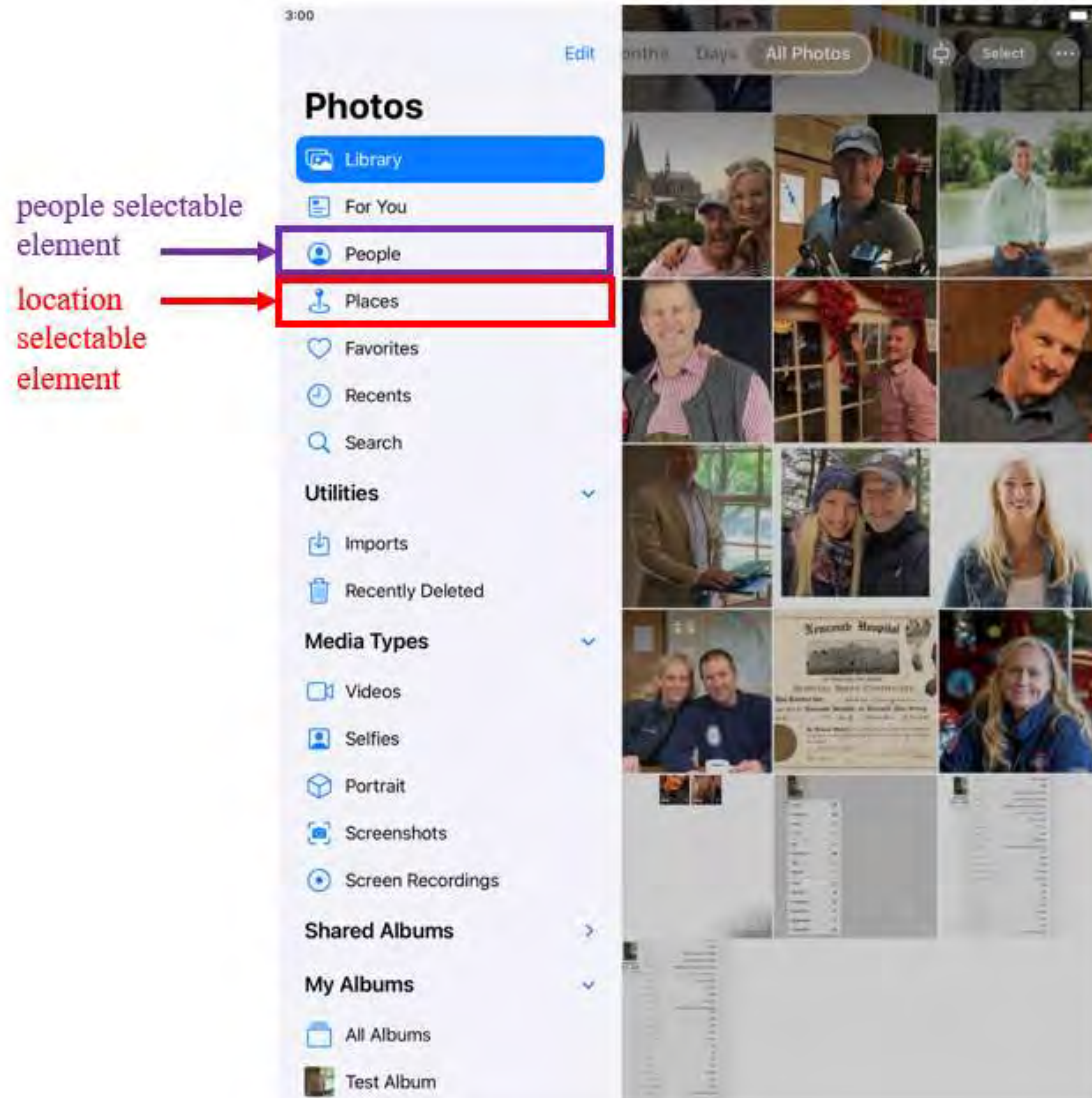
Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, iPadOS displays a second digital file on the interface.

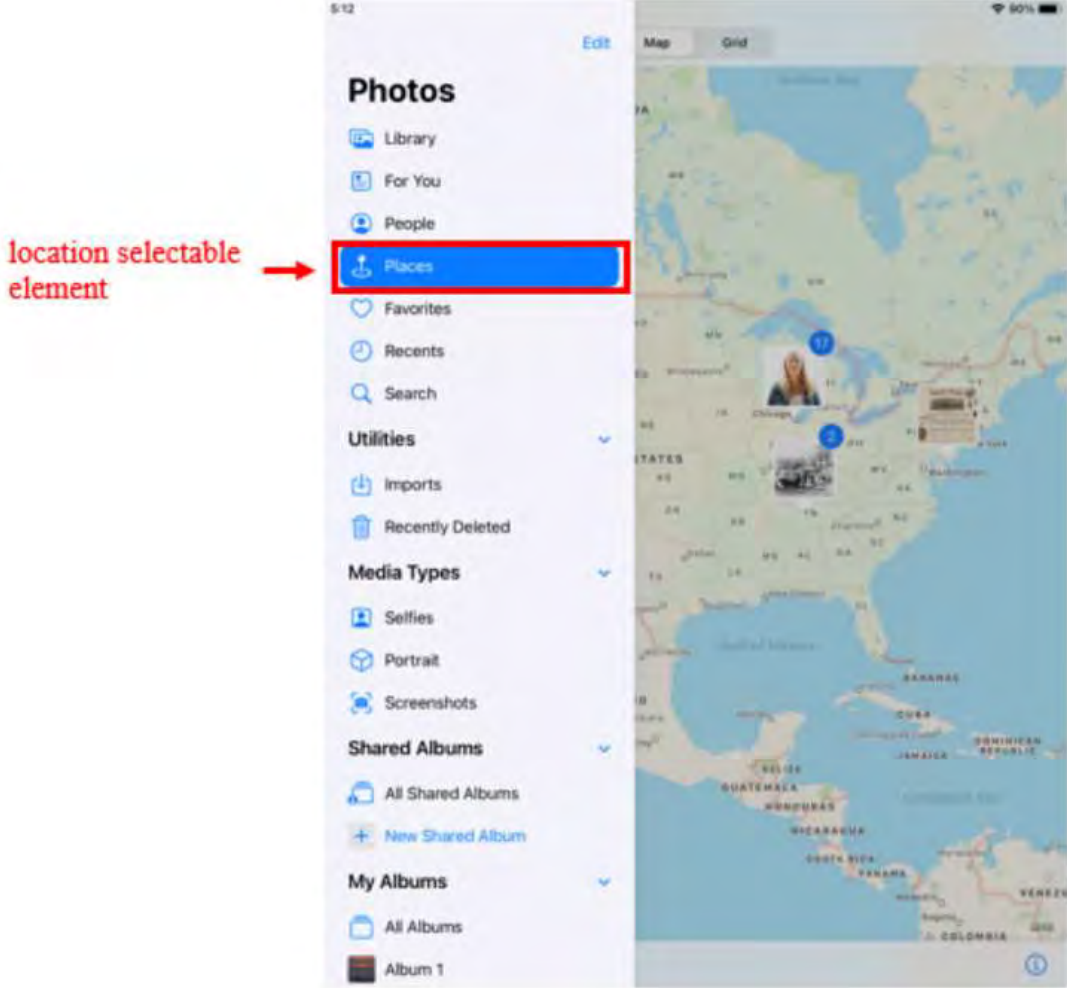


	
<p><b>17[pre]</b> The method of claim 1, further comprising,</p>	<p><i>See information for claim 1.</i></p>

**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,

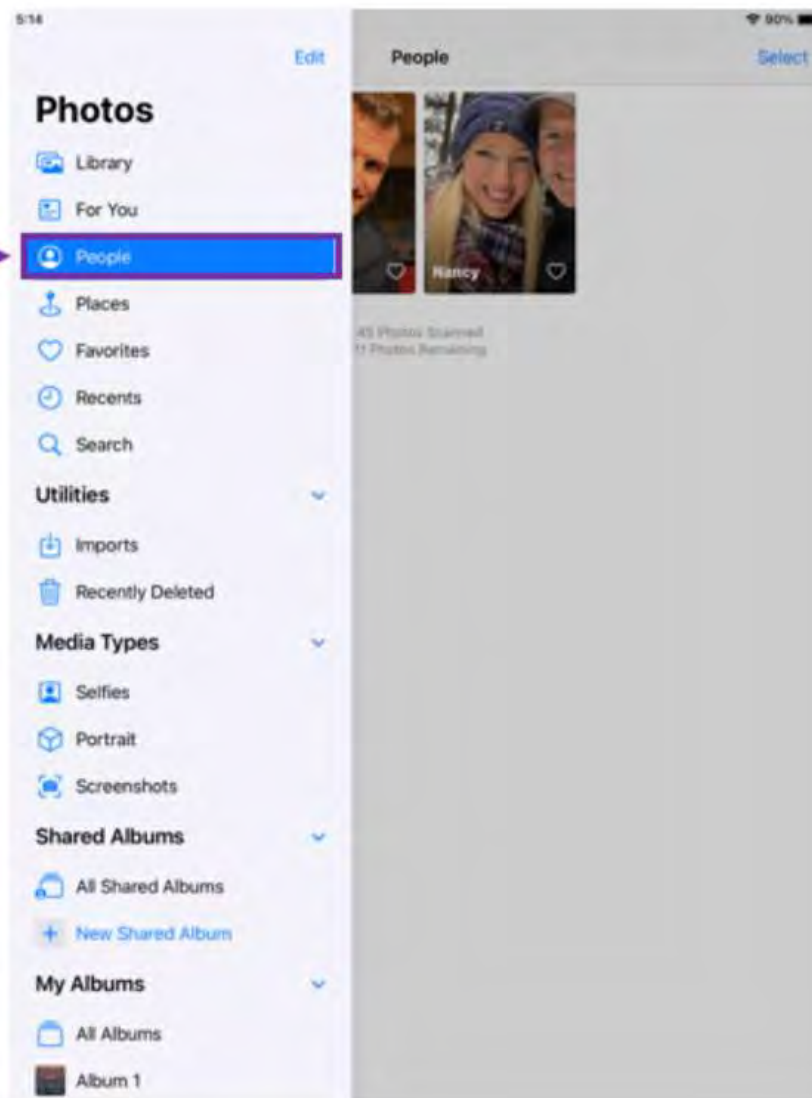
Prior to receiving the first input (see information for element 1[a]), iPadOS displays a plurality of selectable elements on the interface. The plurality of selectable elements includes a location selectable element and a people selectable element.

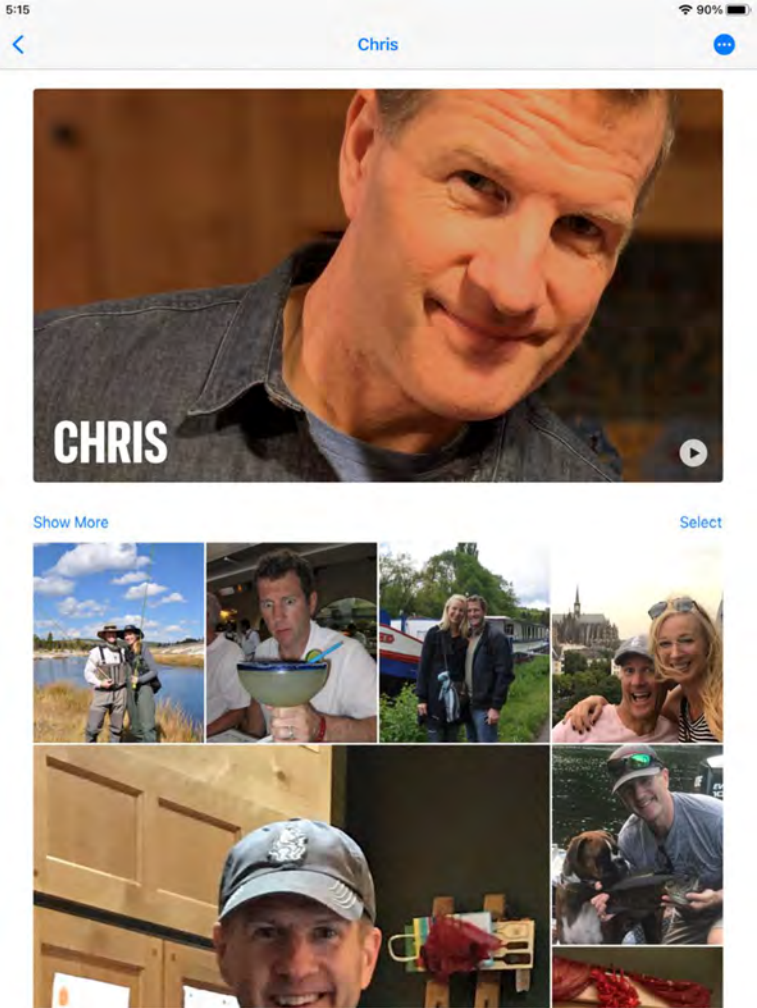


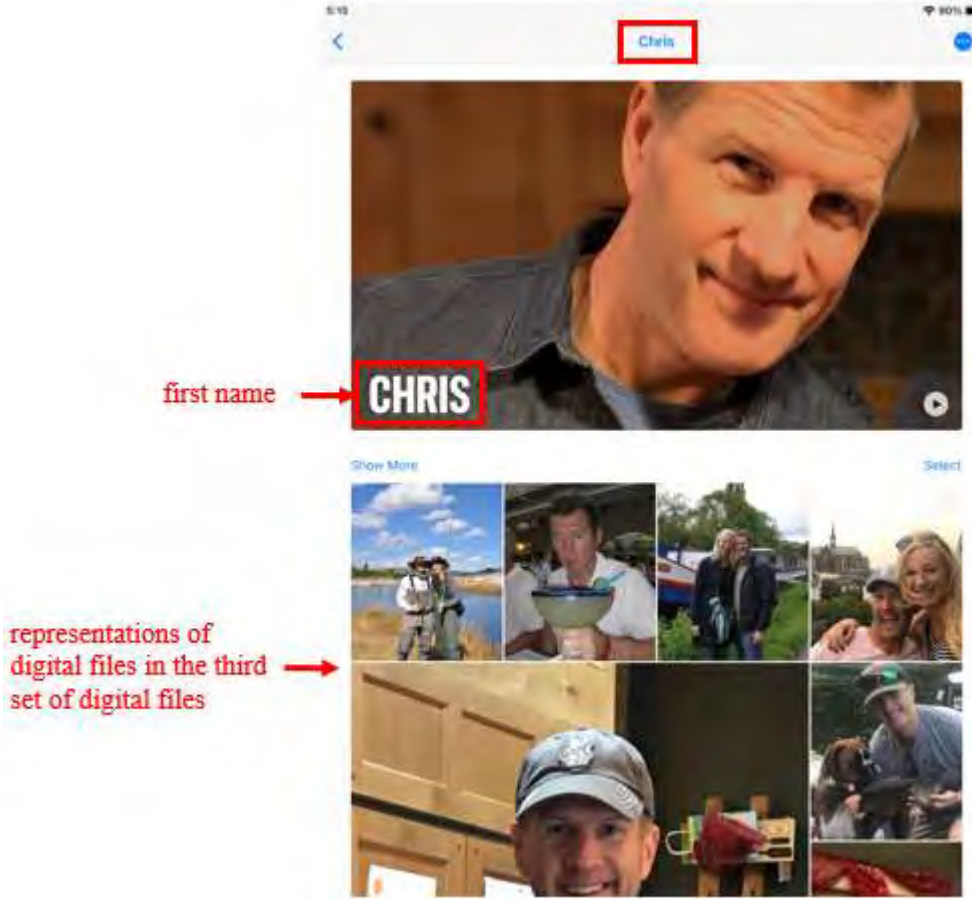
<p><b>17[b]</b> wherein the first input is indicative of a selection of the location selectable element, and</p>	<p>The first input is indicative of a selection of the location selectable element.</p>  <p>location selectable element</p>
<p><b>17[c]</b> wherein the second input is indicative of a</p>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

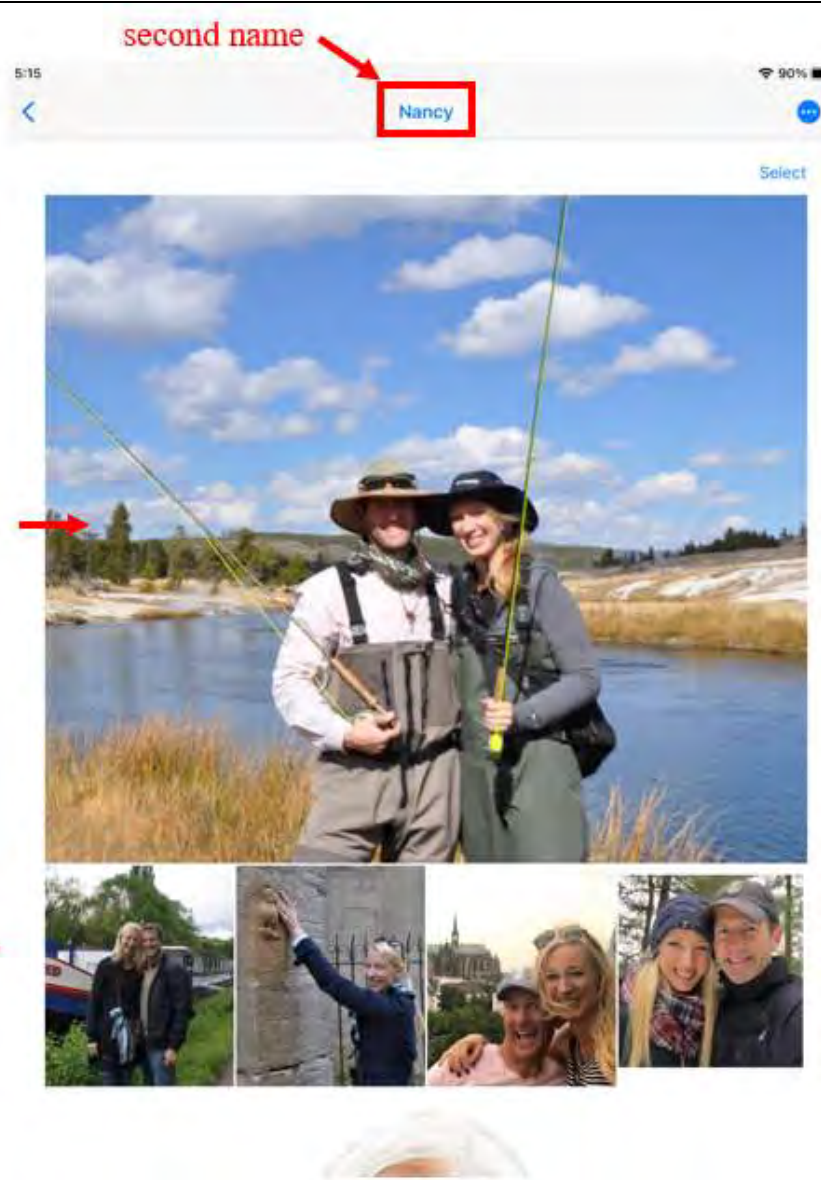


**19[b]** (i) the second name and (ii) a representation of each

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.



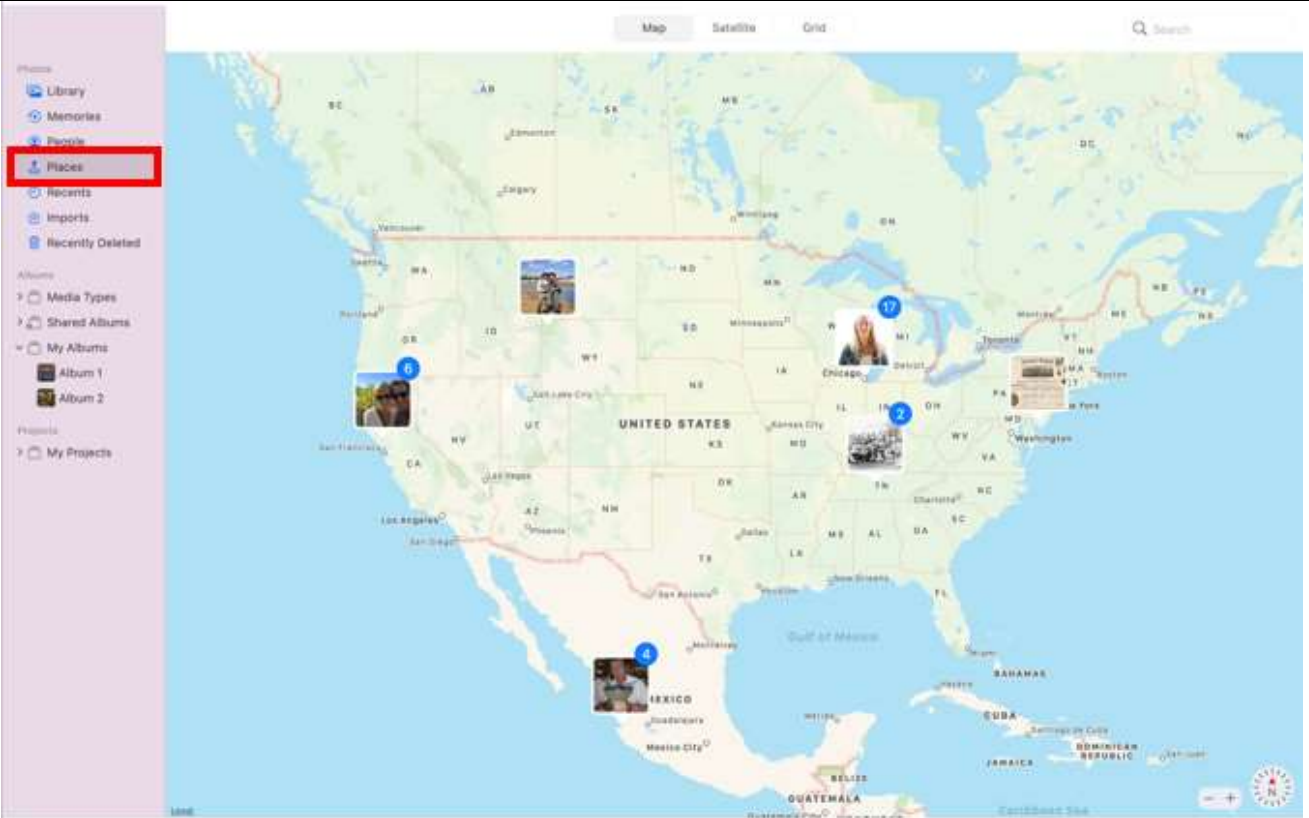
# **Exhibit C.3**

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

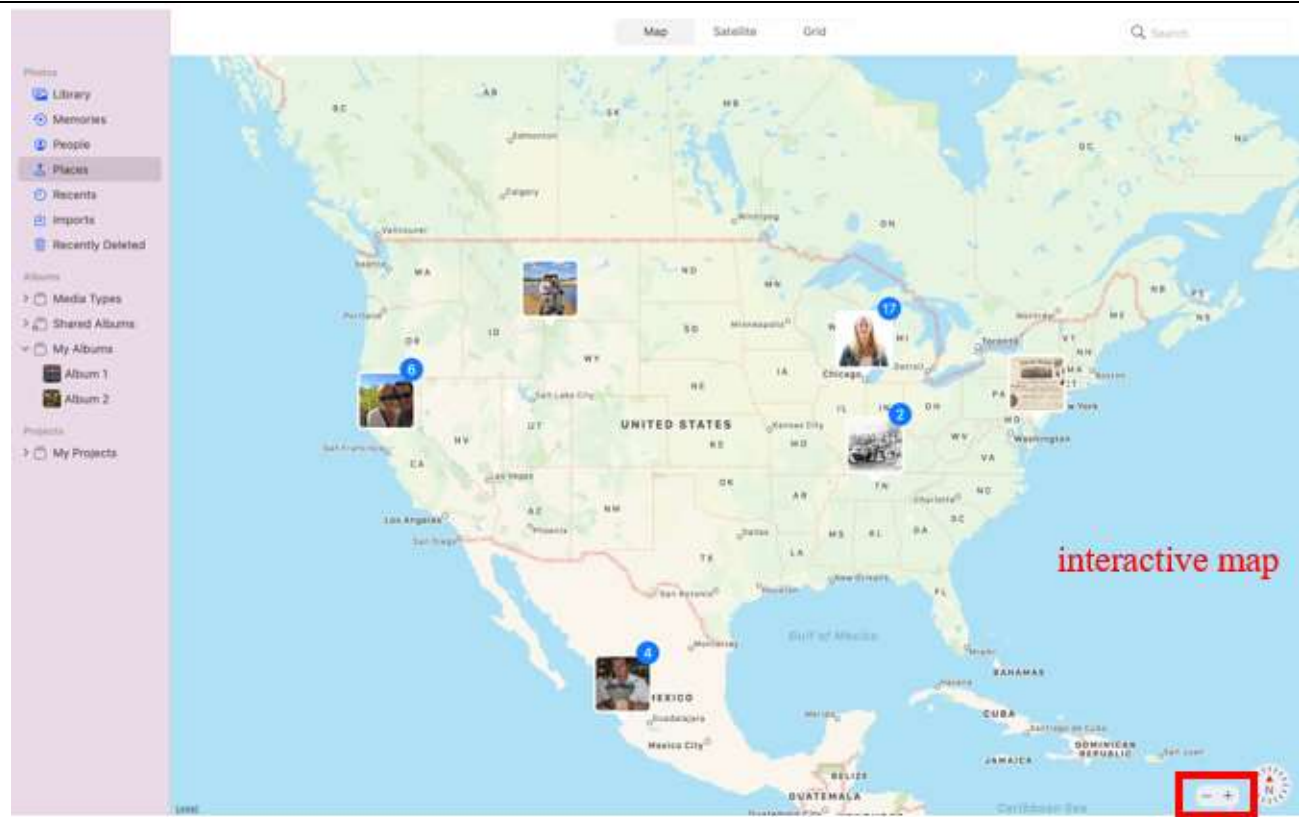
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,621,228 (“the ‘228 patent”) in Apple macOS (including the Photos application). The exemplary screenshots below were taken using an Apple MacBook Pro running macOS 11.5.2 and Photos Version 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

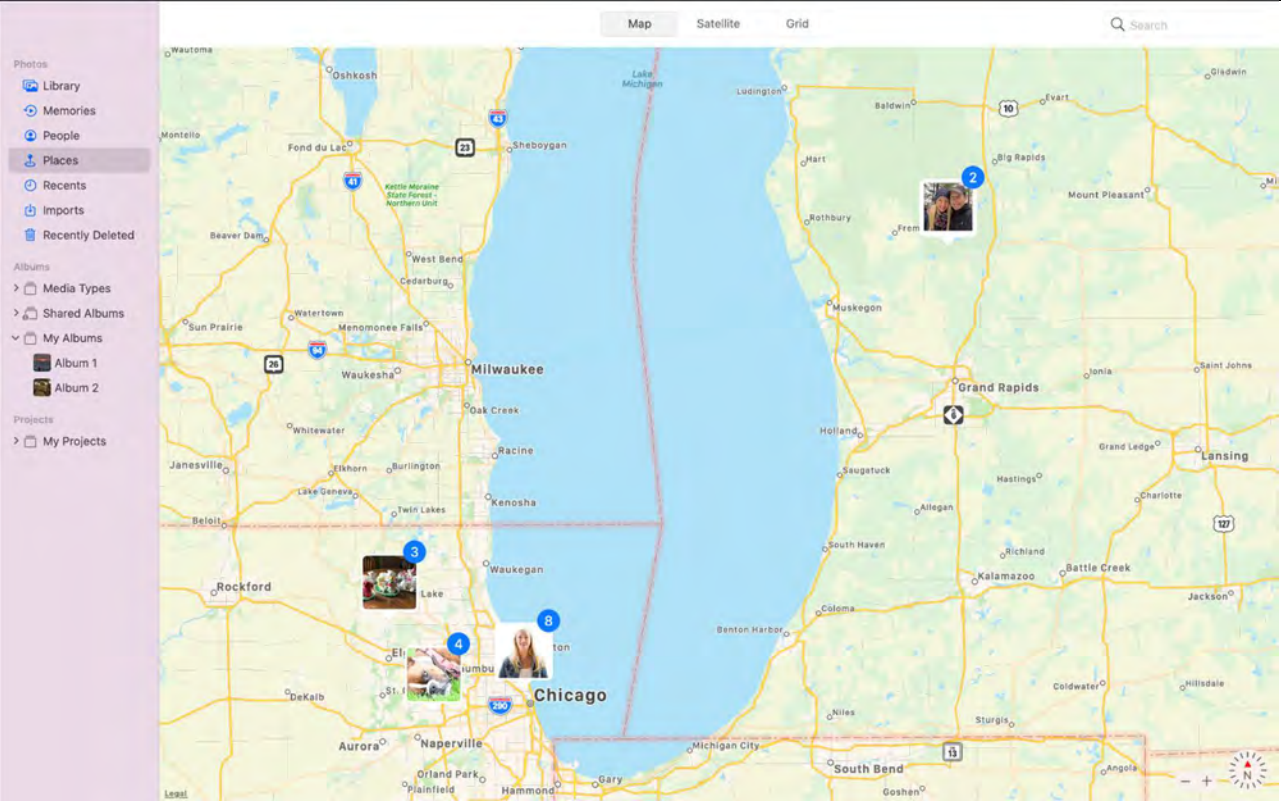
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (highlighted with a red box), Recents, Imports, and Recently Deleted. Below these are sections for Albums (Media Types, Shared Albums, My Albums) and Projects (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 standard interactive features like zooming and navigation. At the top of the map area, there are tabs for 'Map', 'Satellite', and 'Grid', and a search bar.</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>

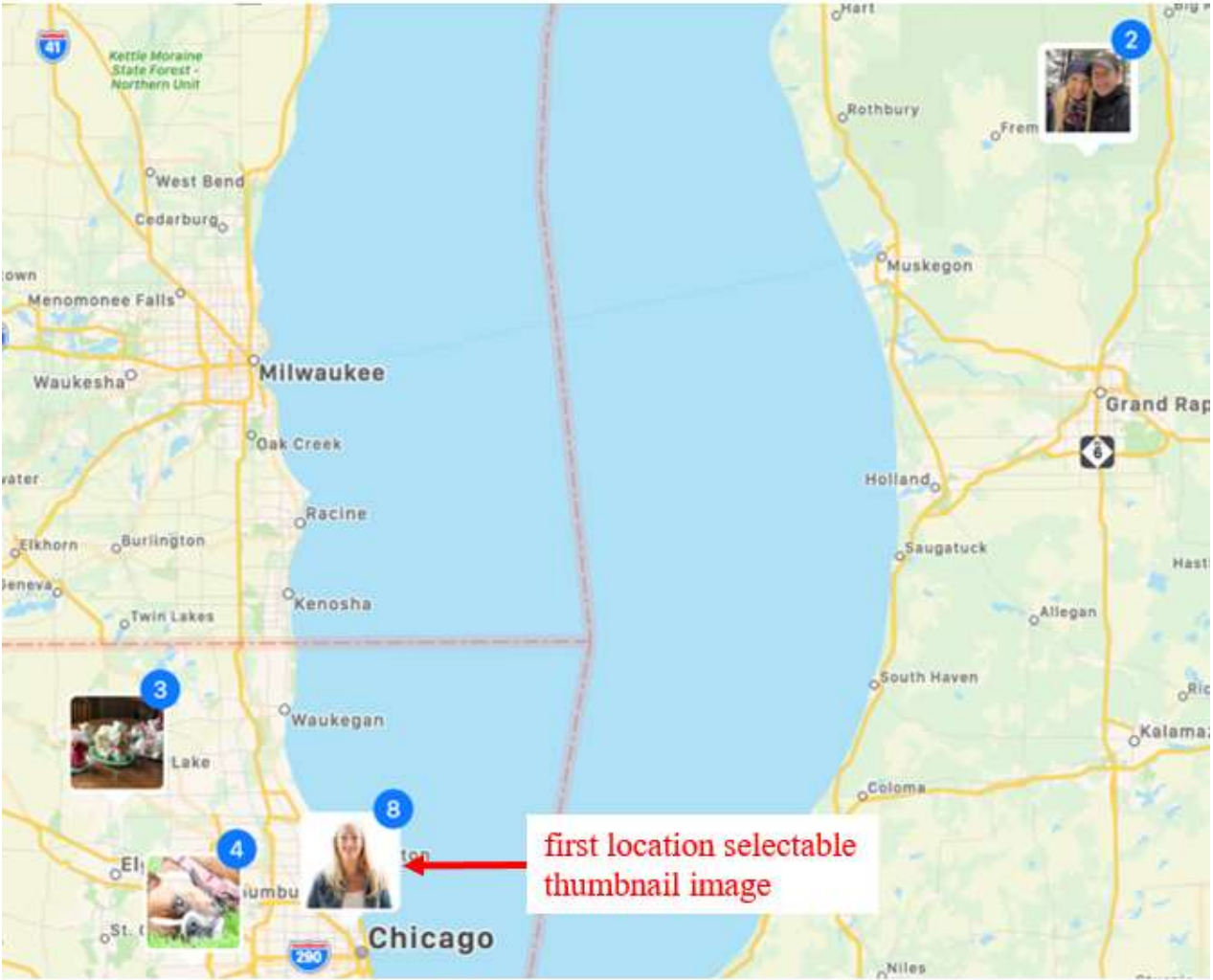
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS



A zoomed in view is shown below.

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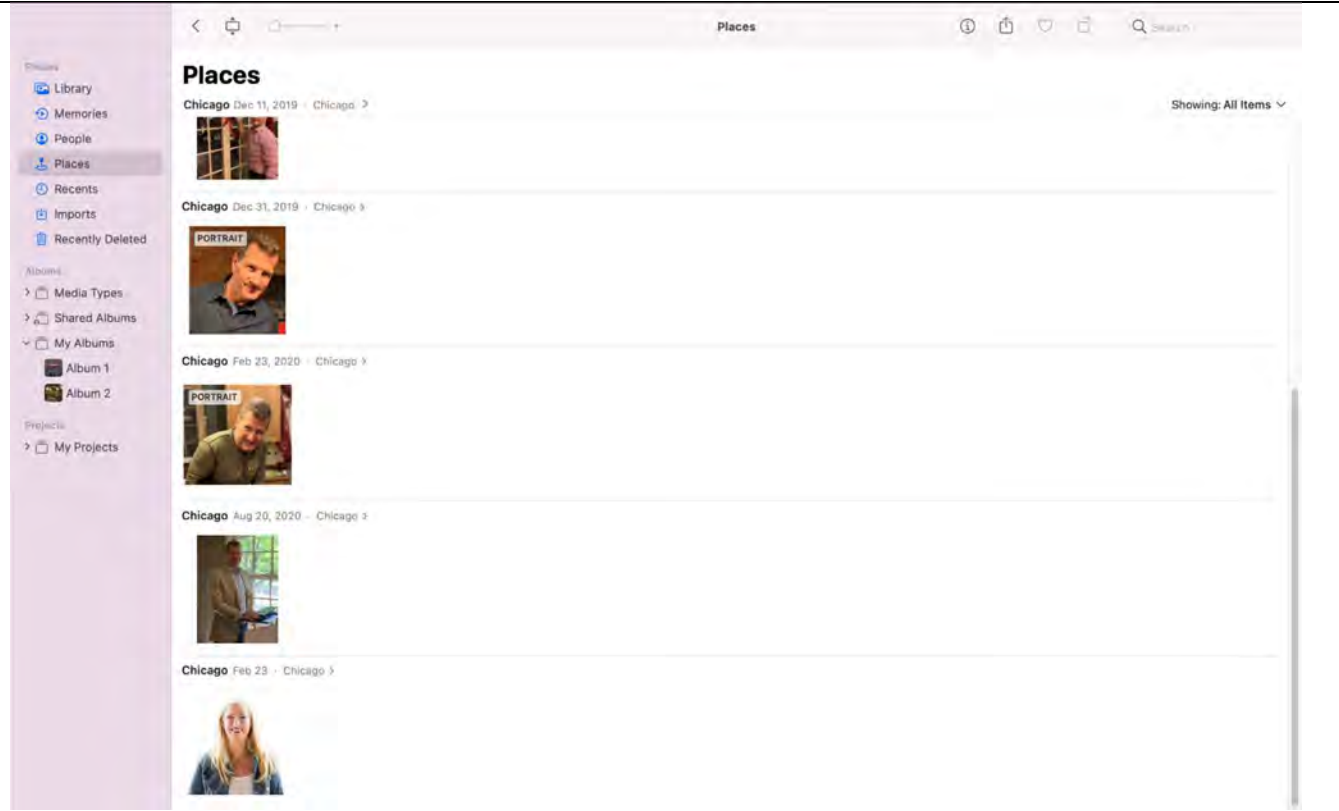
	
<p><b>1[a][ii]</b> (ii) a first location selectable thumbnail image at a first location on the interactive map; and</p>	<p>The map view includes a first location selectable thumbnail image at a first location on the interactive map.</p>

	 <p>The map view includes a second location selectable thumbnail image at a second location on the interactive map.</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><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>

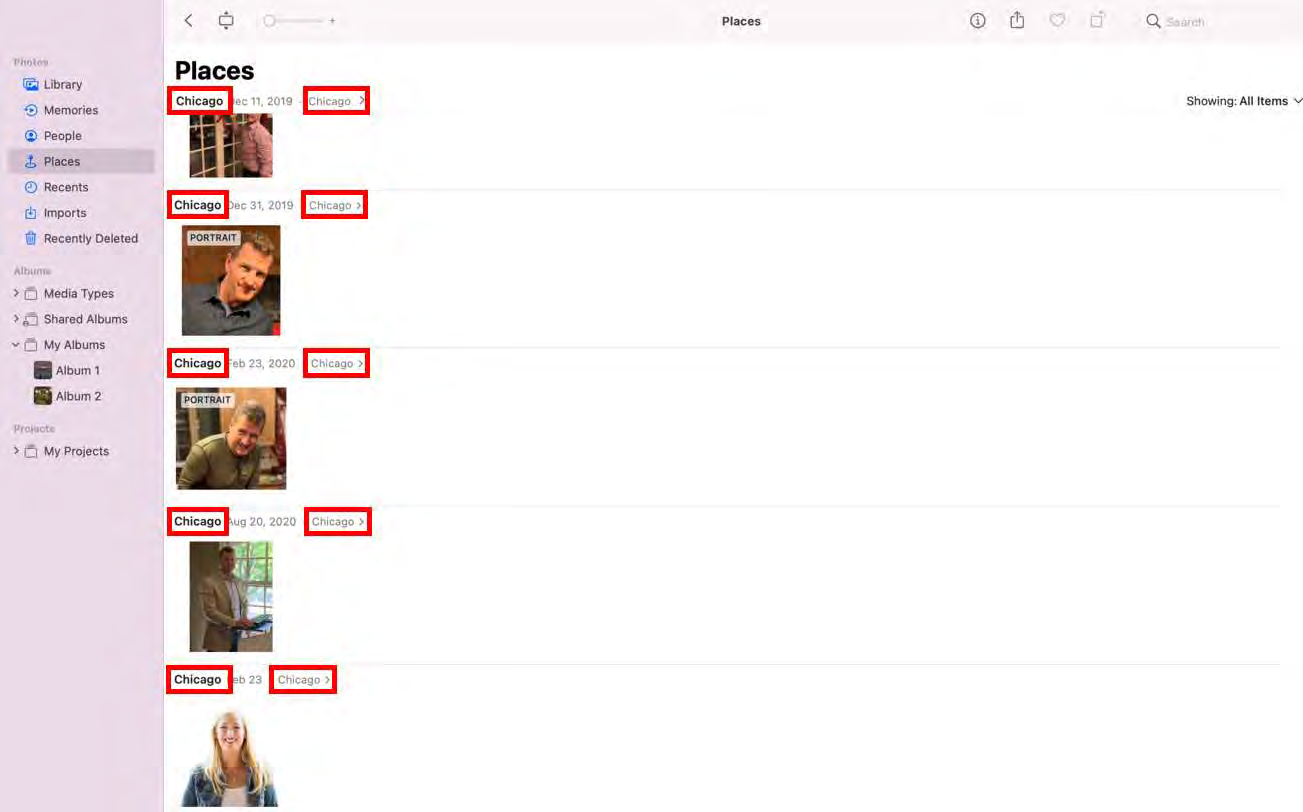


causing a first location view to be displayed on the interface, the first location view including

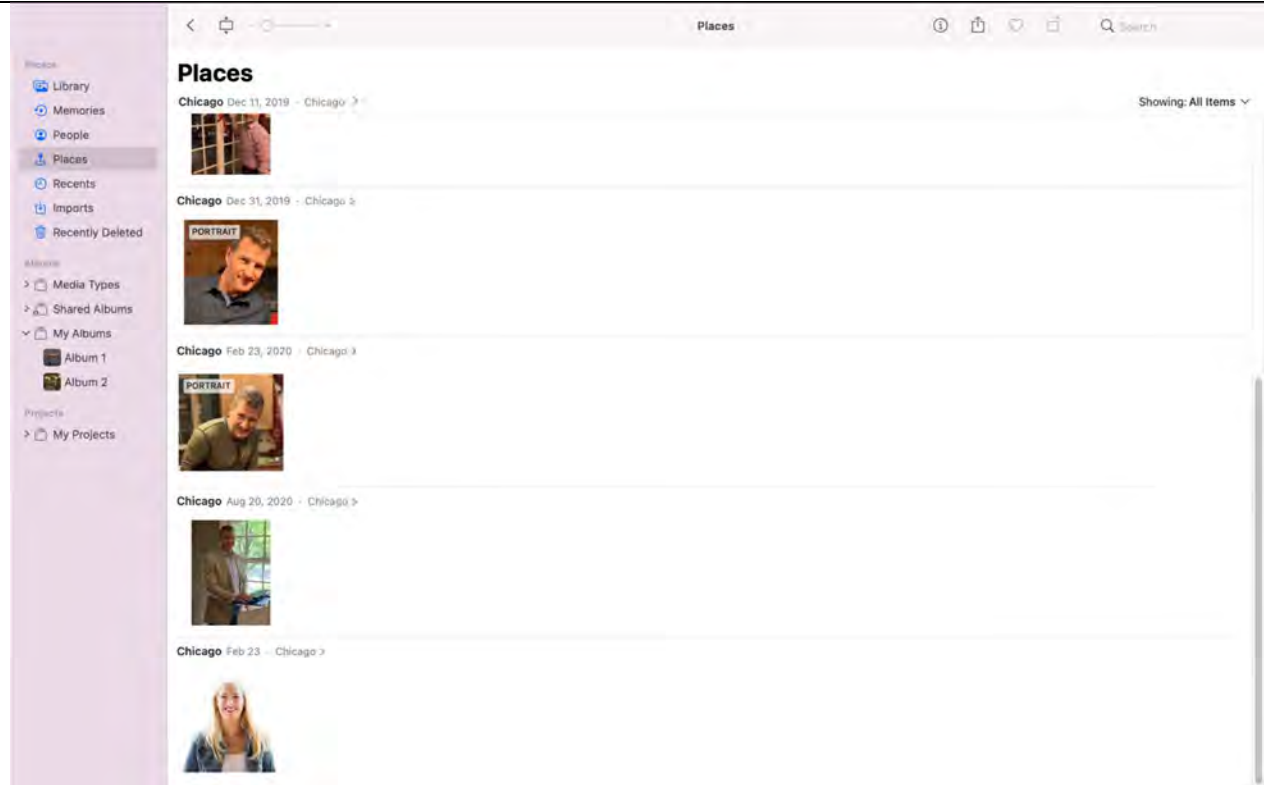


**1[b][i]** (i) a first location name associated with the first location and

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

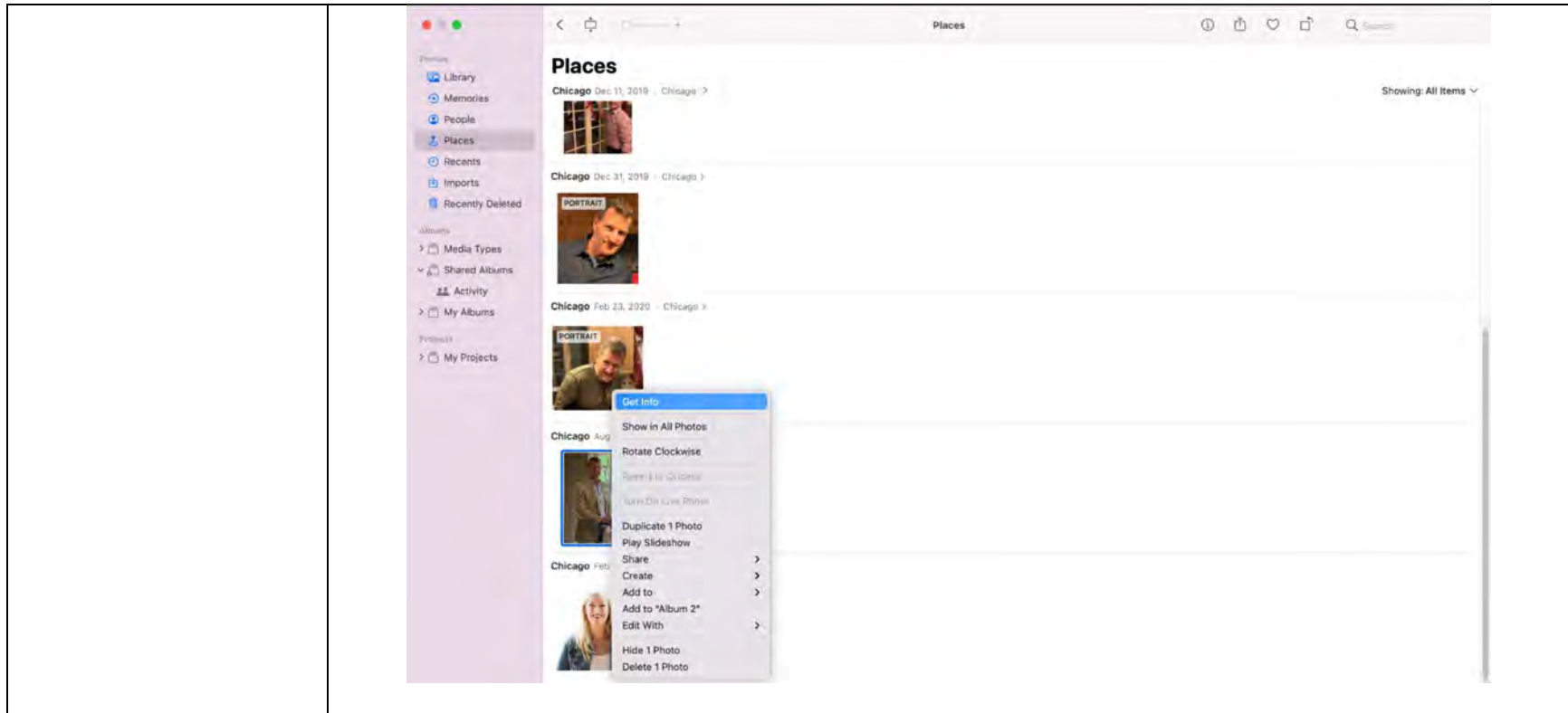
	
<p><b>1[b][ii]</b> (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs of one or more digital imaging devices, the first set of digital files</p>	<p>The first location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

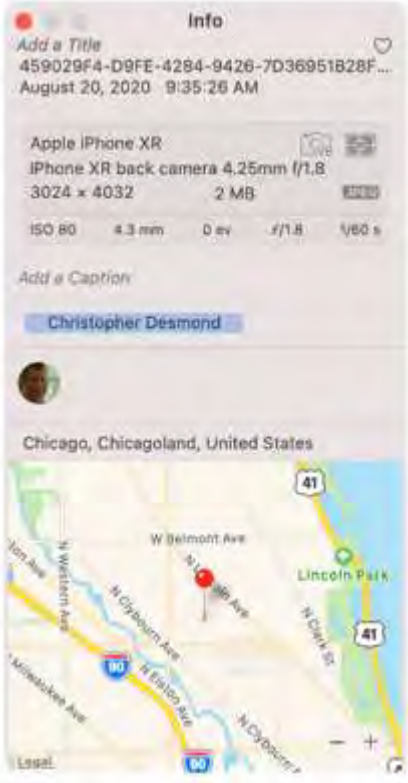
including digital files associated with the first location;

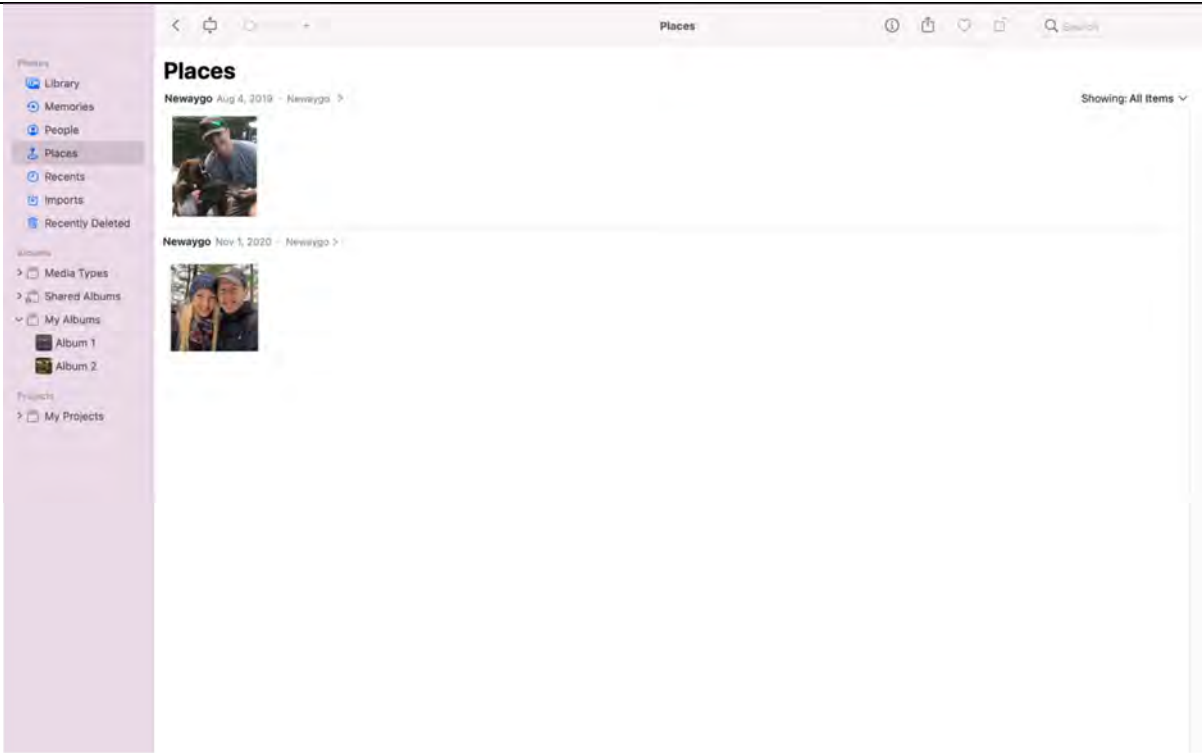


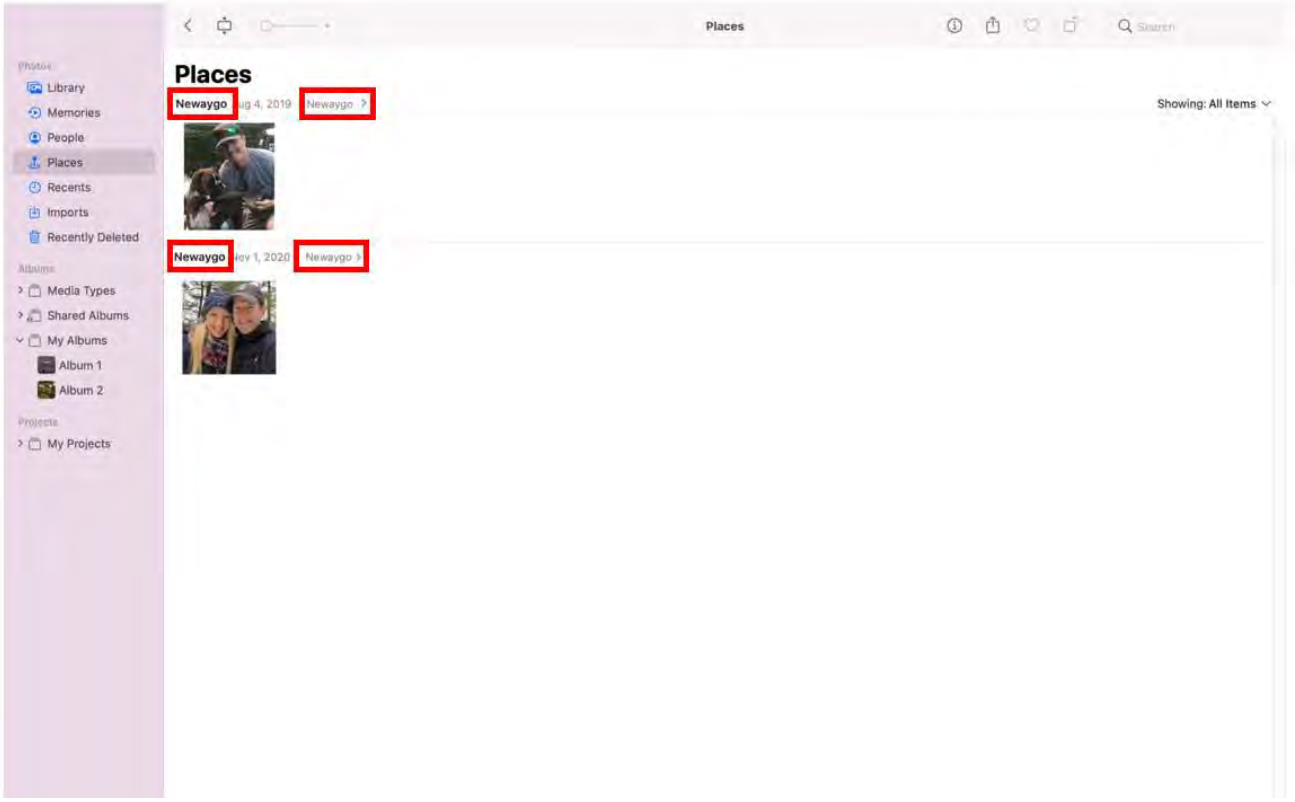
Each of the digital files in the first set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

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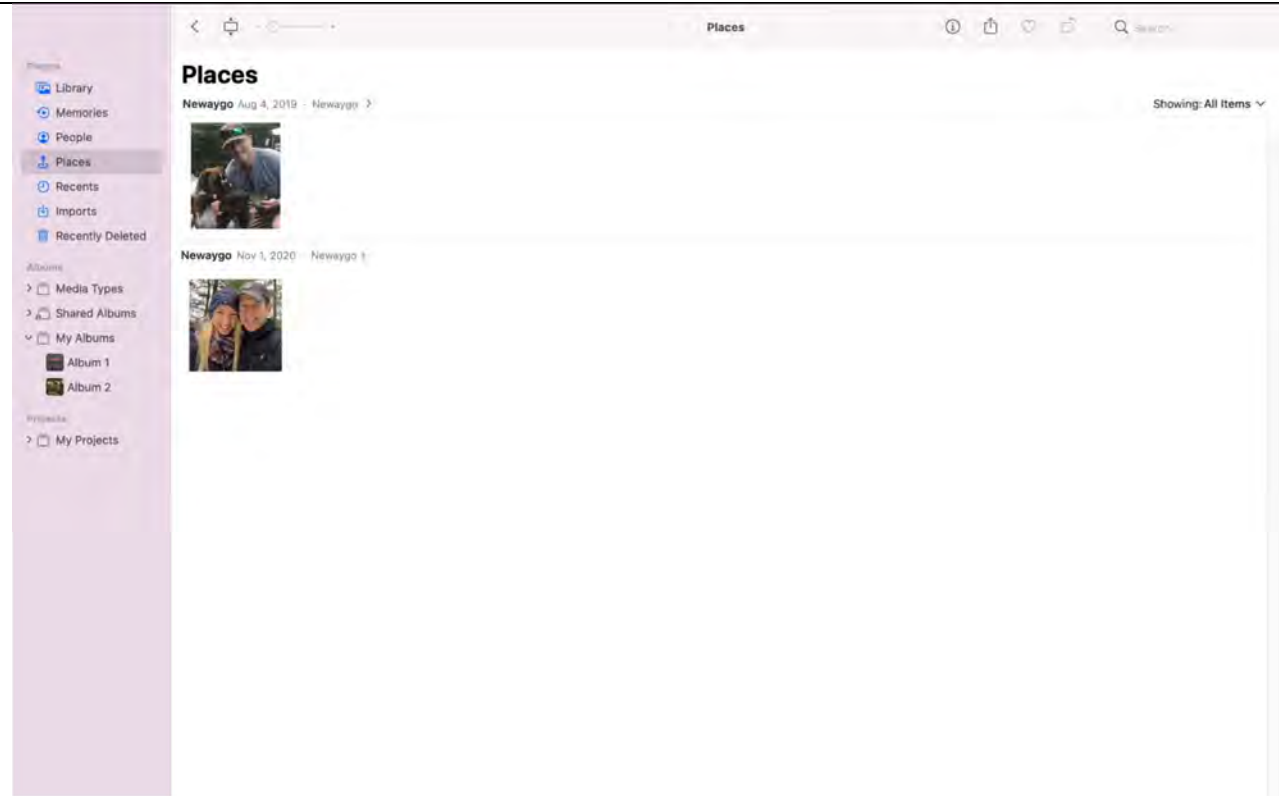


	 <p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone XR (a digital imaging device). The first set of digital files includes digital files associated with the first location (in this example, Chicago or Chicagoland).</p>
<p><b>1[c]</b> 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>

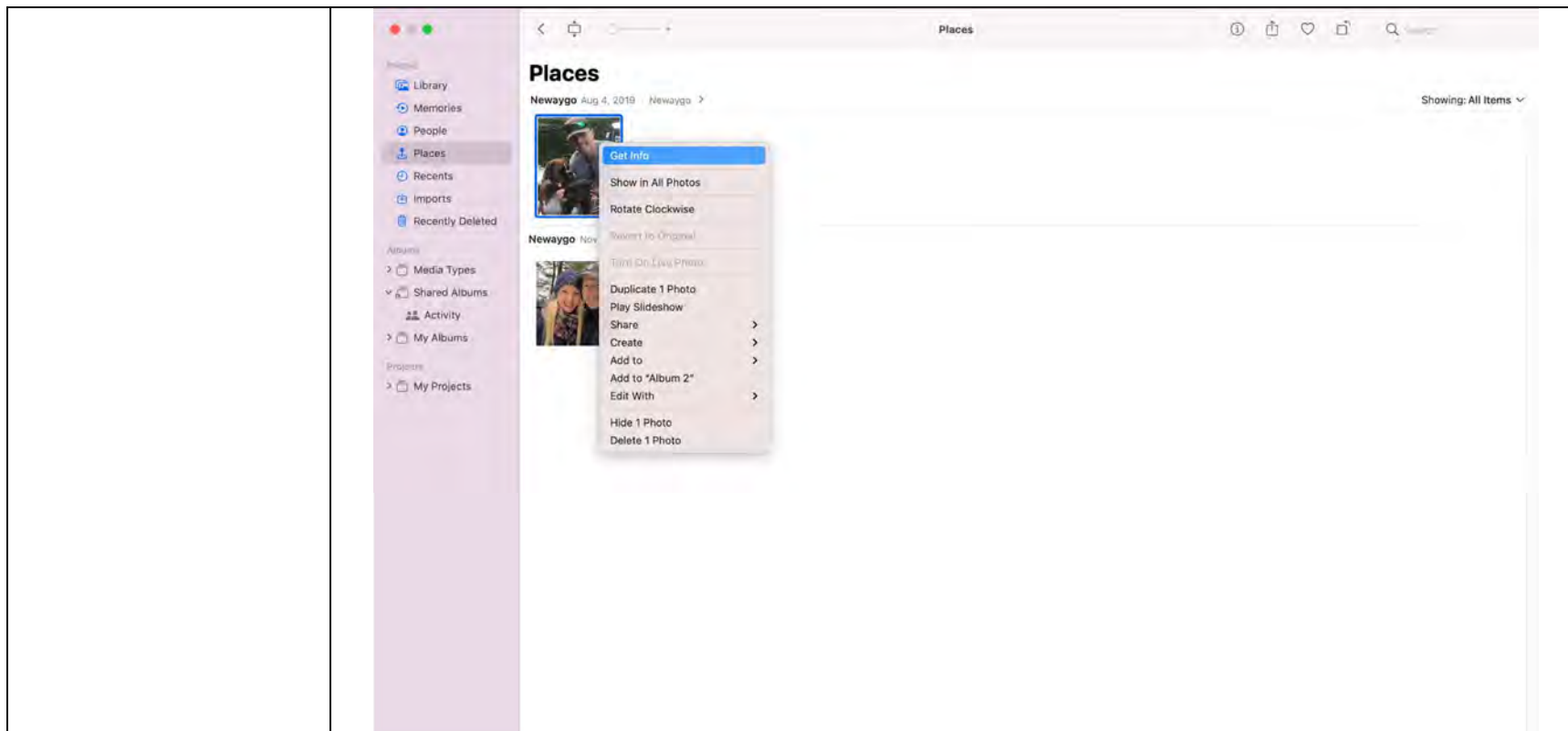
files associated with the second location; and

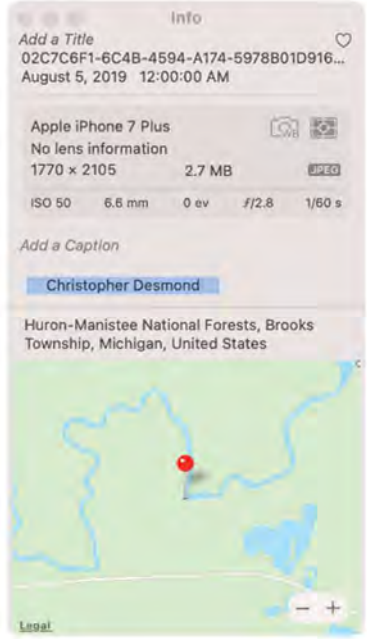


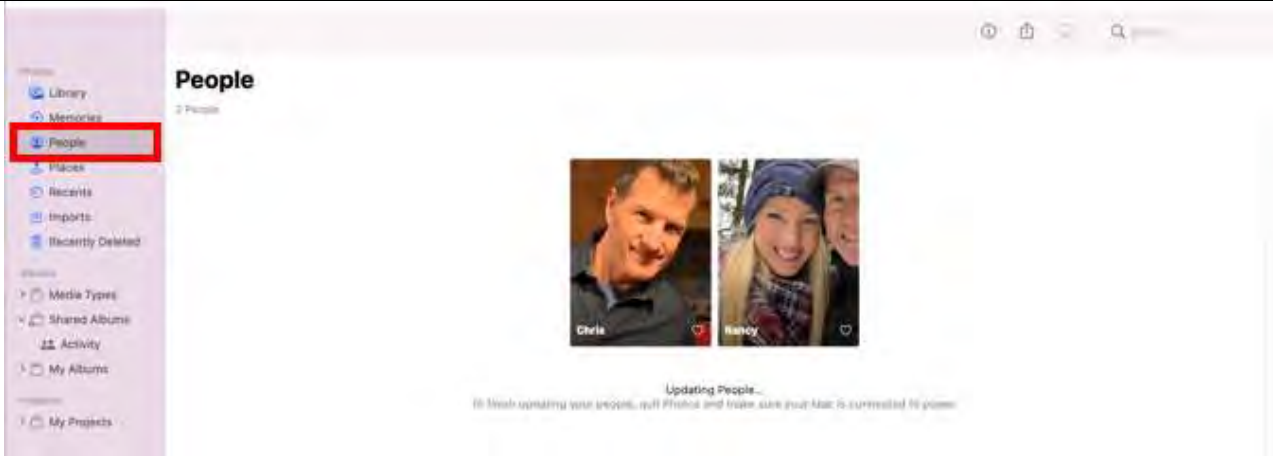
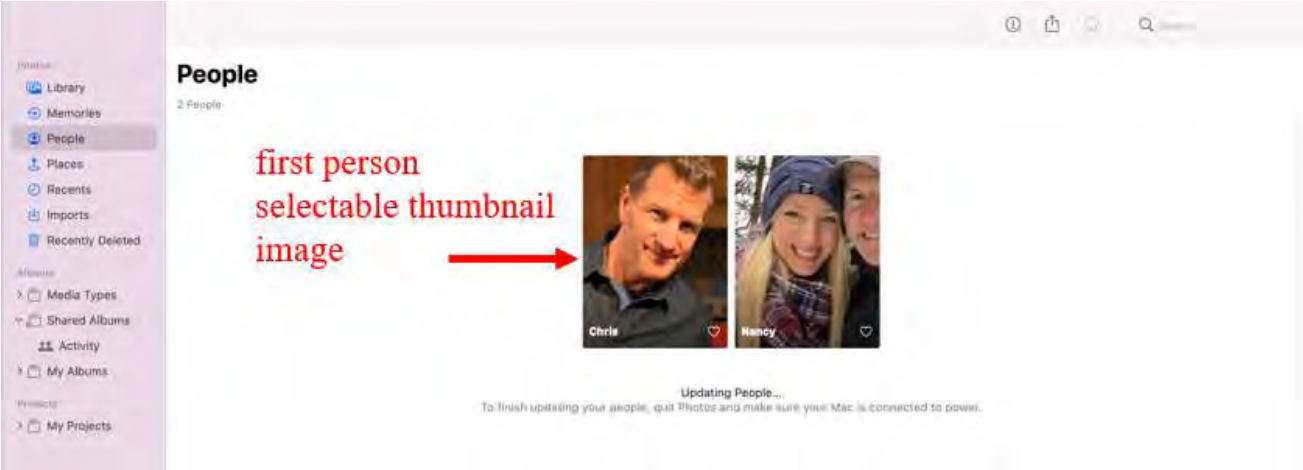
Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., an iPhone or another device).

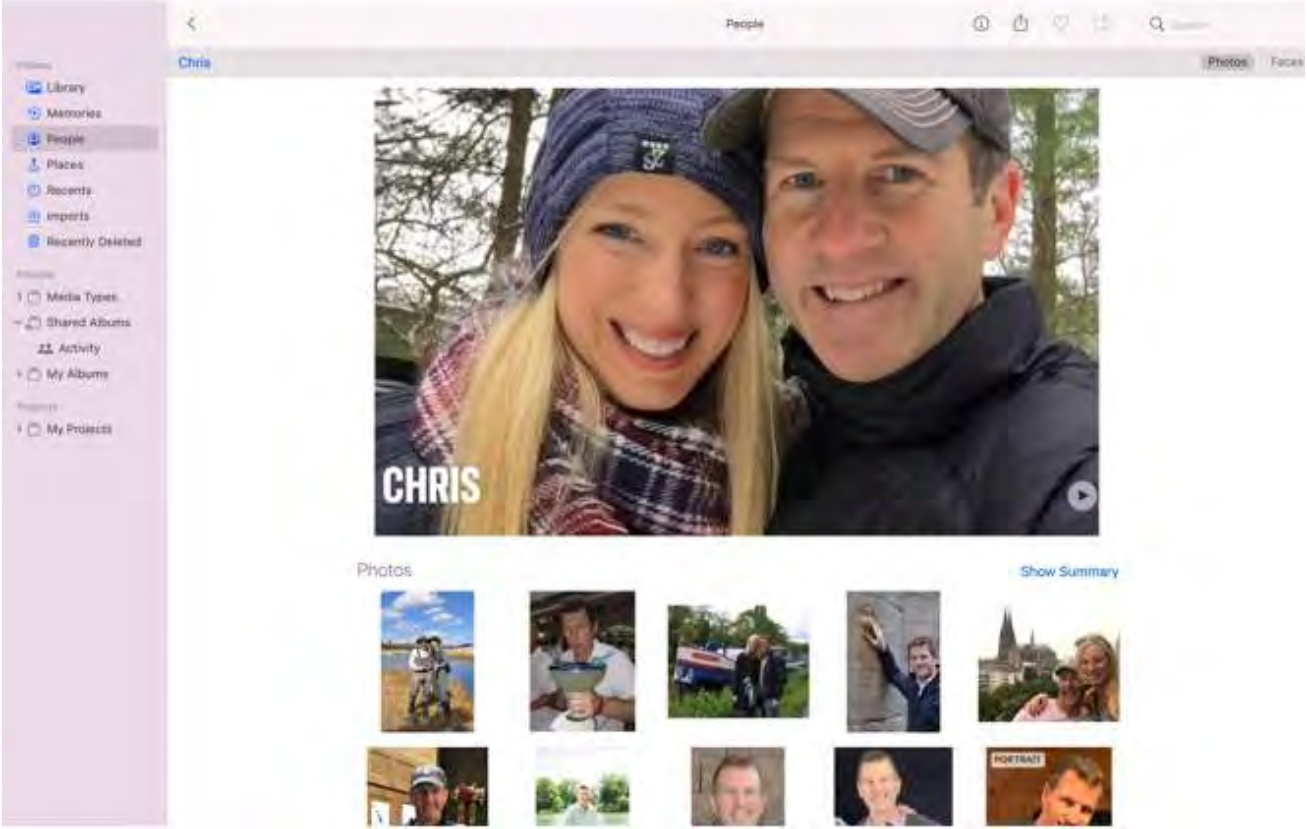


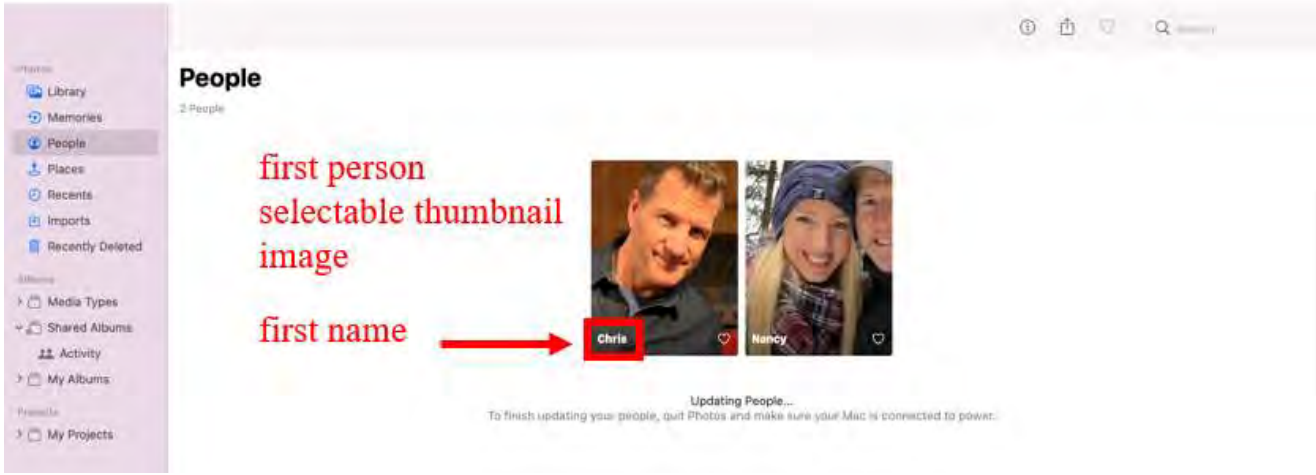
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS



	 <p>In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone 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>

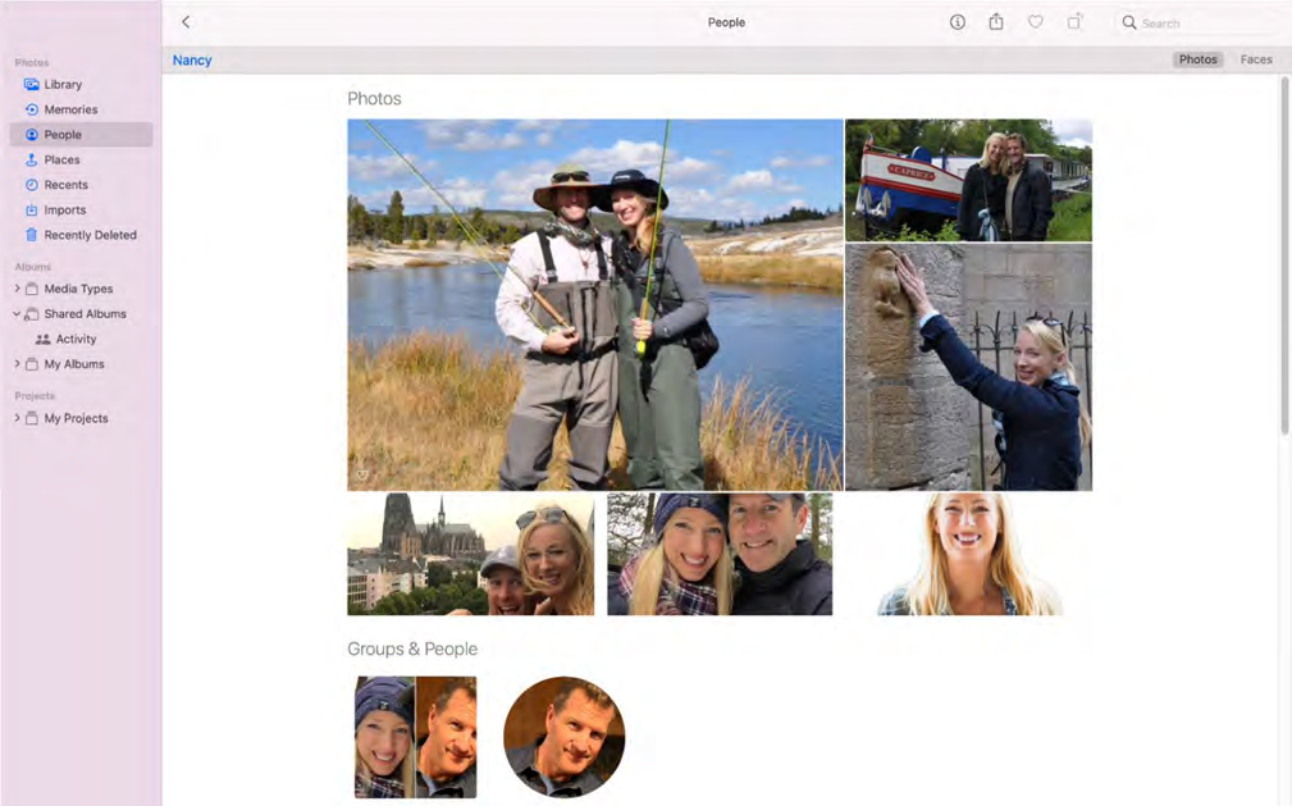
	
<p><b>1[d][ii]</b> (ii) a first name associated with the first person, the first name being displayed adjacent to the first person selectable thumbnail image;</p>	<p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.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

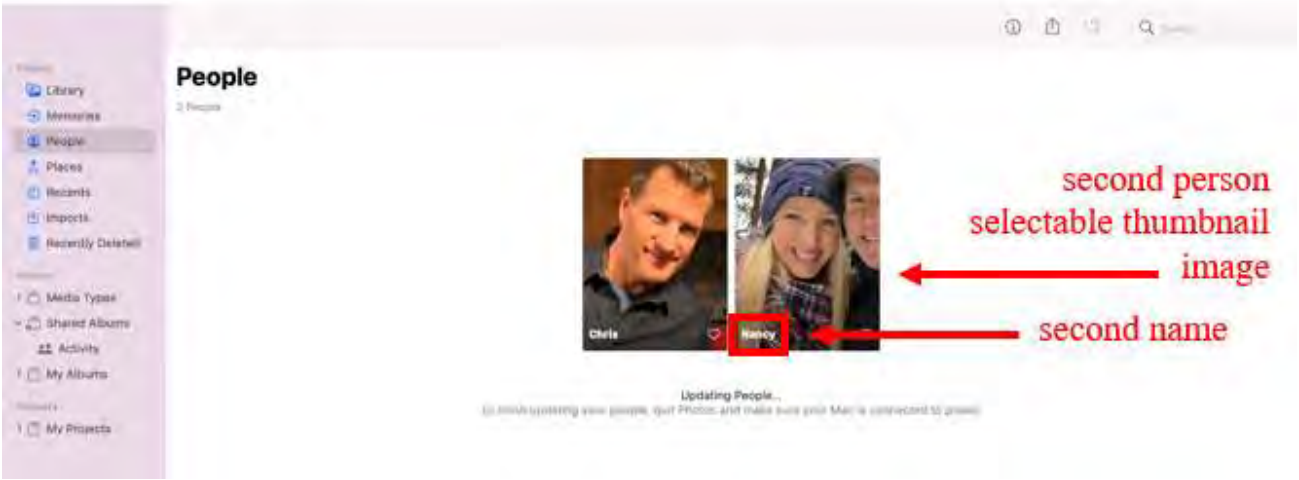
	 <p>To the extent it is found that the first name associated with the first person is not literally displayed adjacent to the first person selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function 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

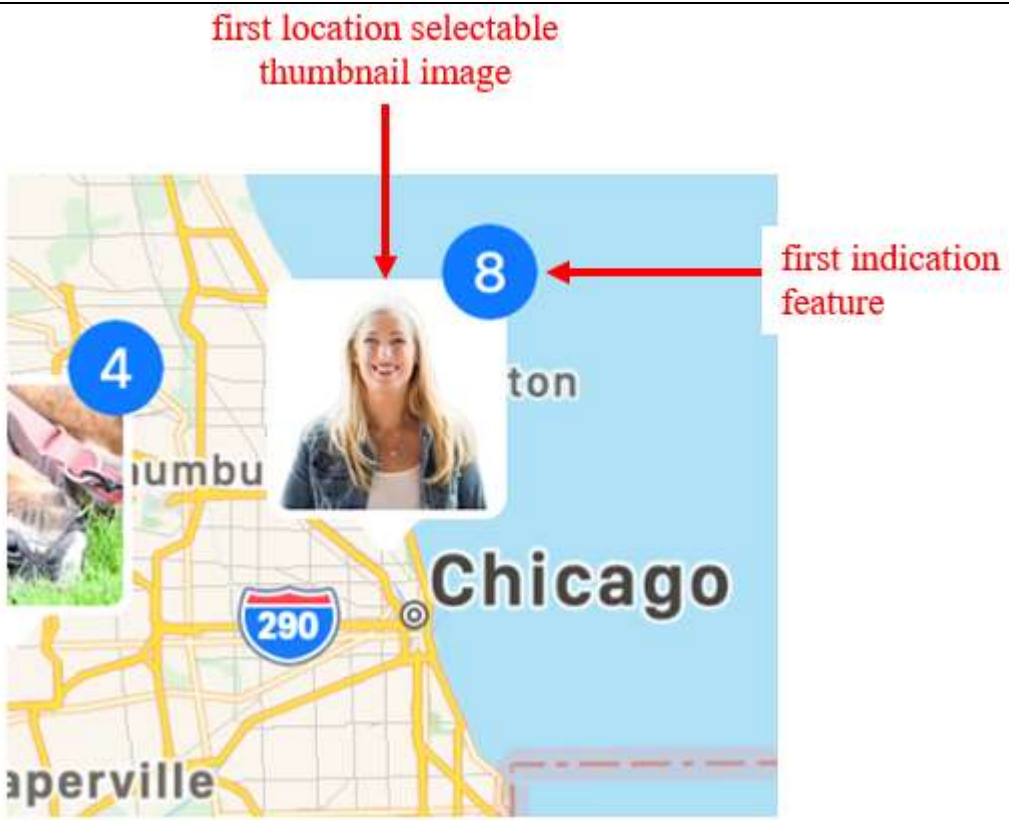


The second person is associated with a fourth set of digital files including digital photographs and videos.

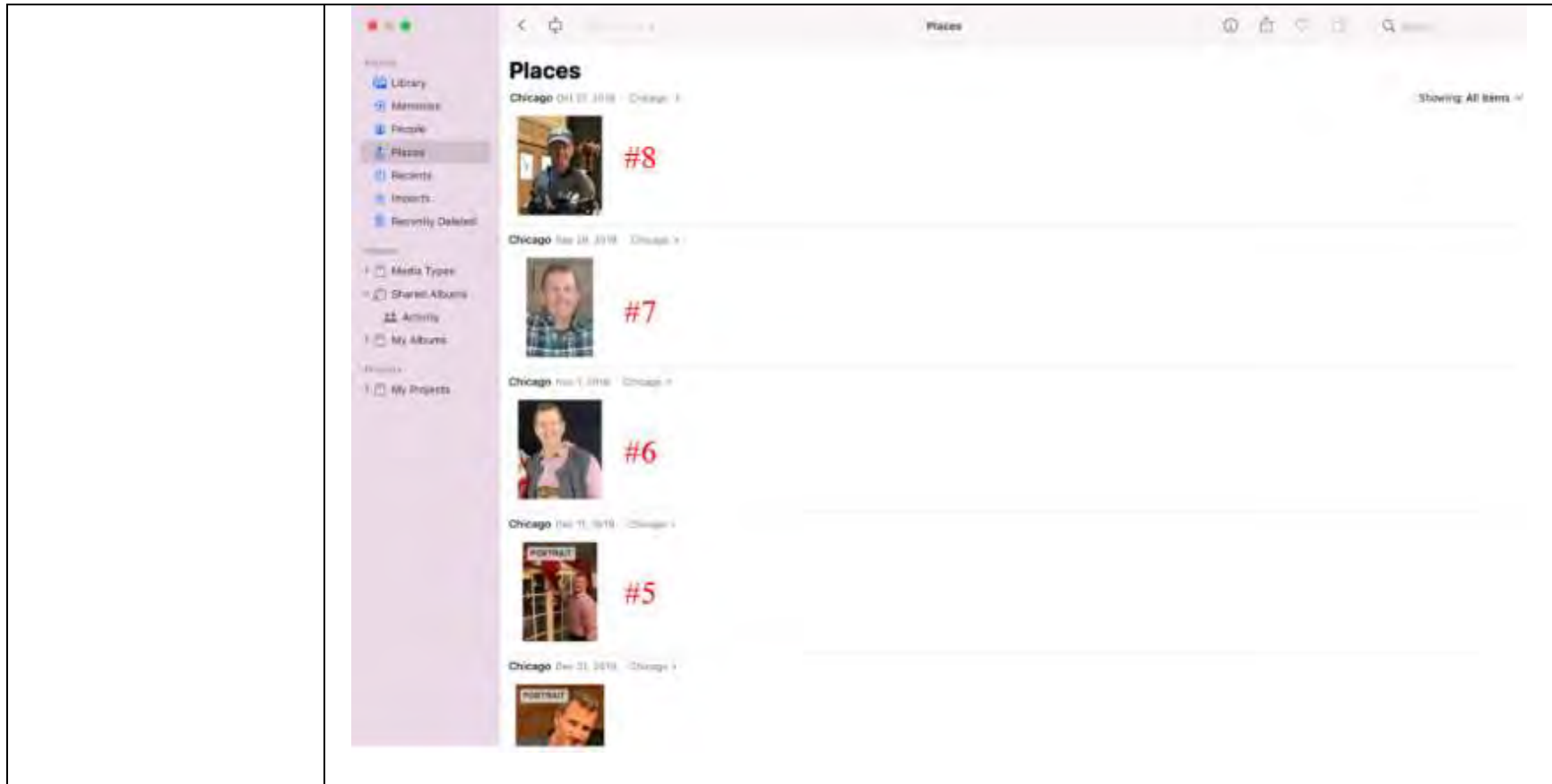
	
<p><b>1[d][iv]</b> (iv) a second name associated with the second person, the second name being displayed adjacent to the second person selectable thumbnail image.</p>	<p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second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



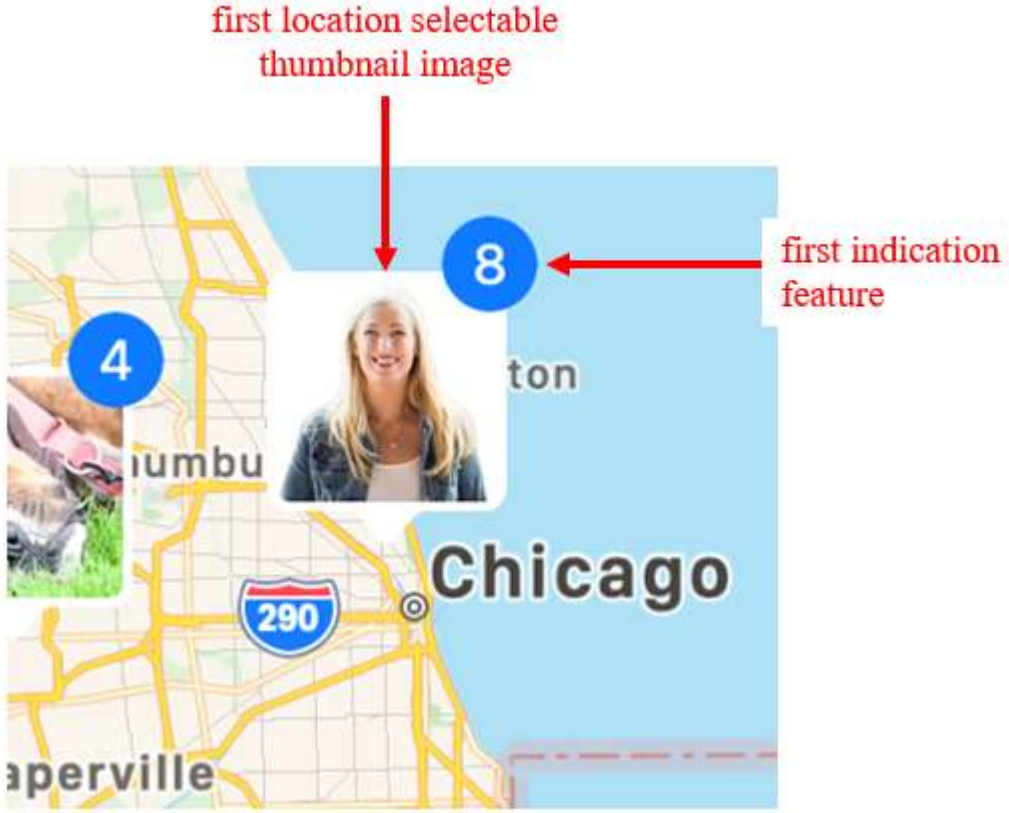
<p>location selectable thumbnail image</p>	
<p><b>2[b]</b> the first indication feature being based on a number of digital files in the first set of digital files in the first set of digital files.</p>	<p>The first indication feature is based on a number of digital files in the first set of digital files.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

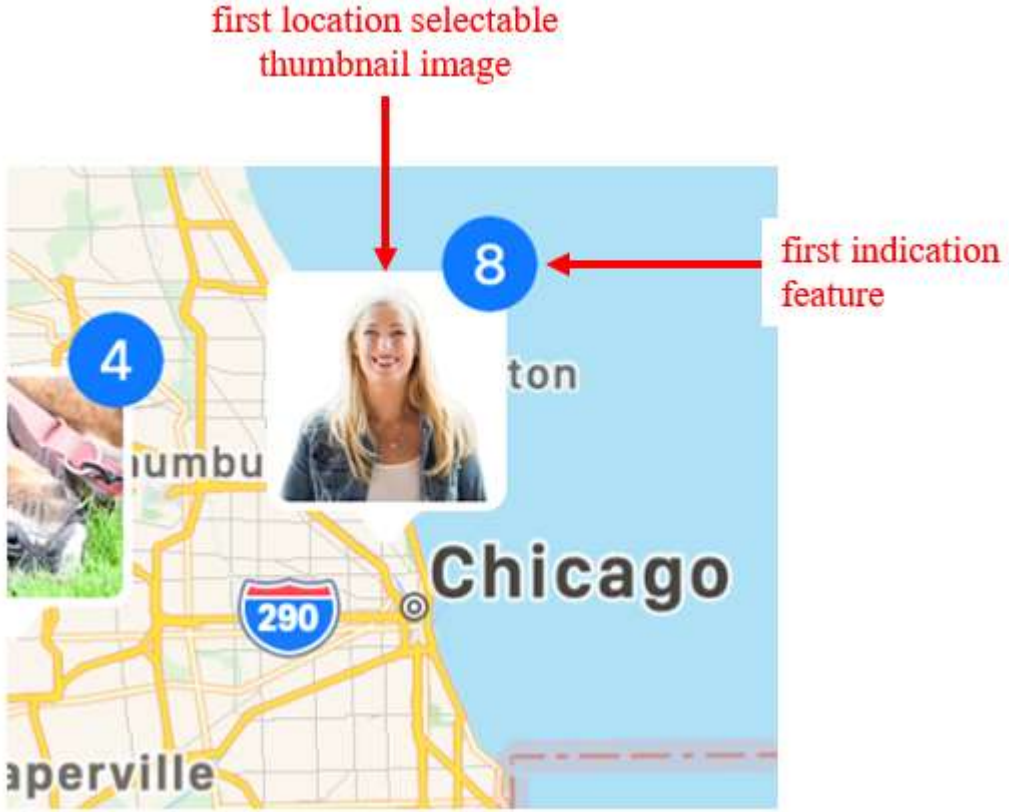
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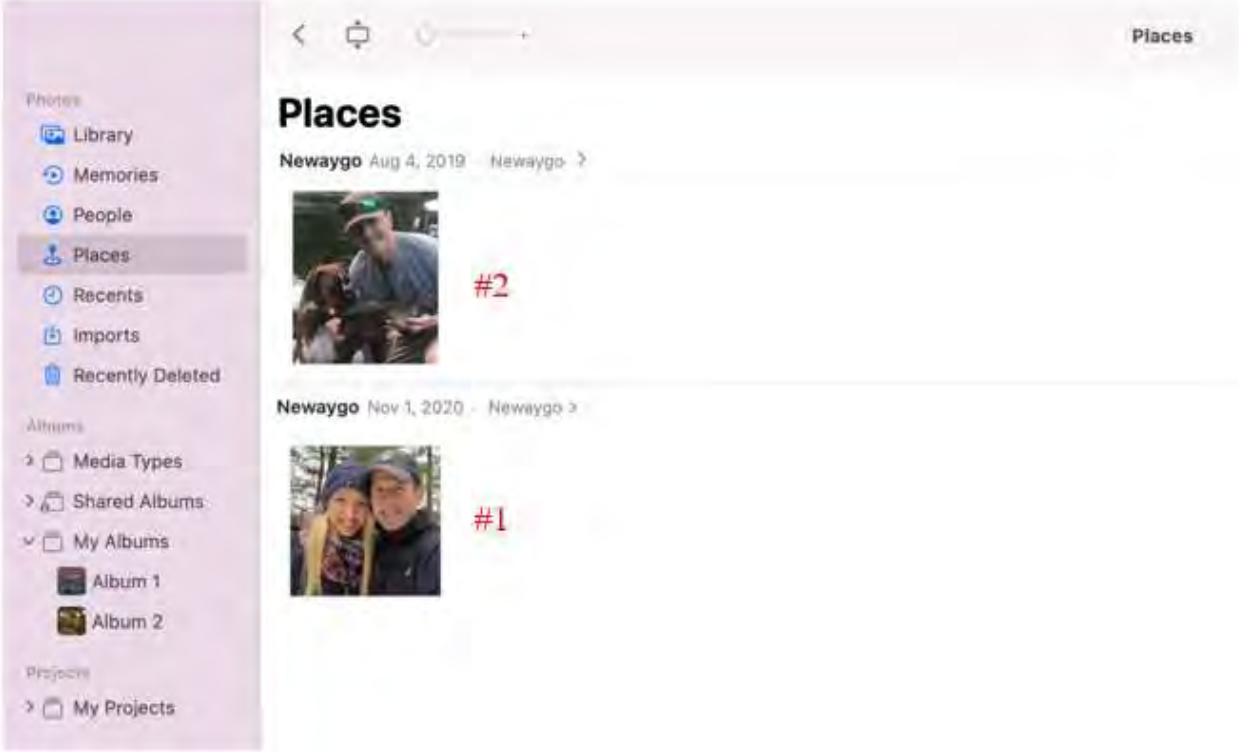
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS


<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>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, likely Chicago, with a central thumbnail image of a woman. A red arrow points from the text "first location selectable thumbnail image" to the thumbnail. Another red arrow points from the text "first indication feature" to a blue circle with the number "8" on the map. A second 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 a man and a woman. Another red arrow points from the text 'second indication feature' to the blue circle with the number '2'. The map shows a road and labels for 'Big Rapid' and 'Frem'.</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>

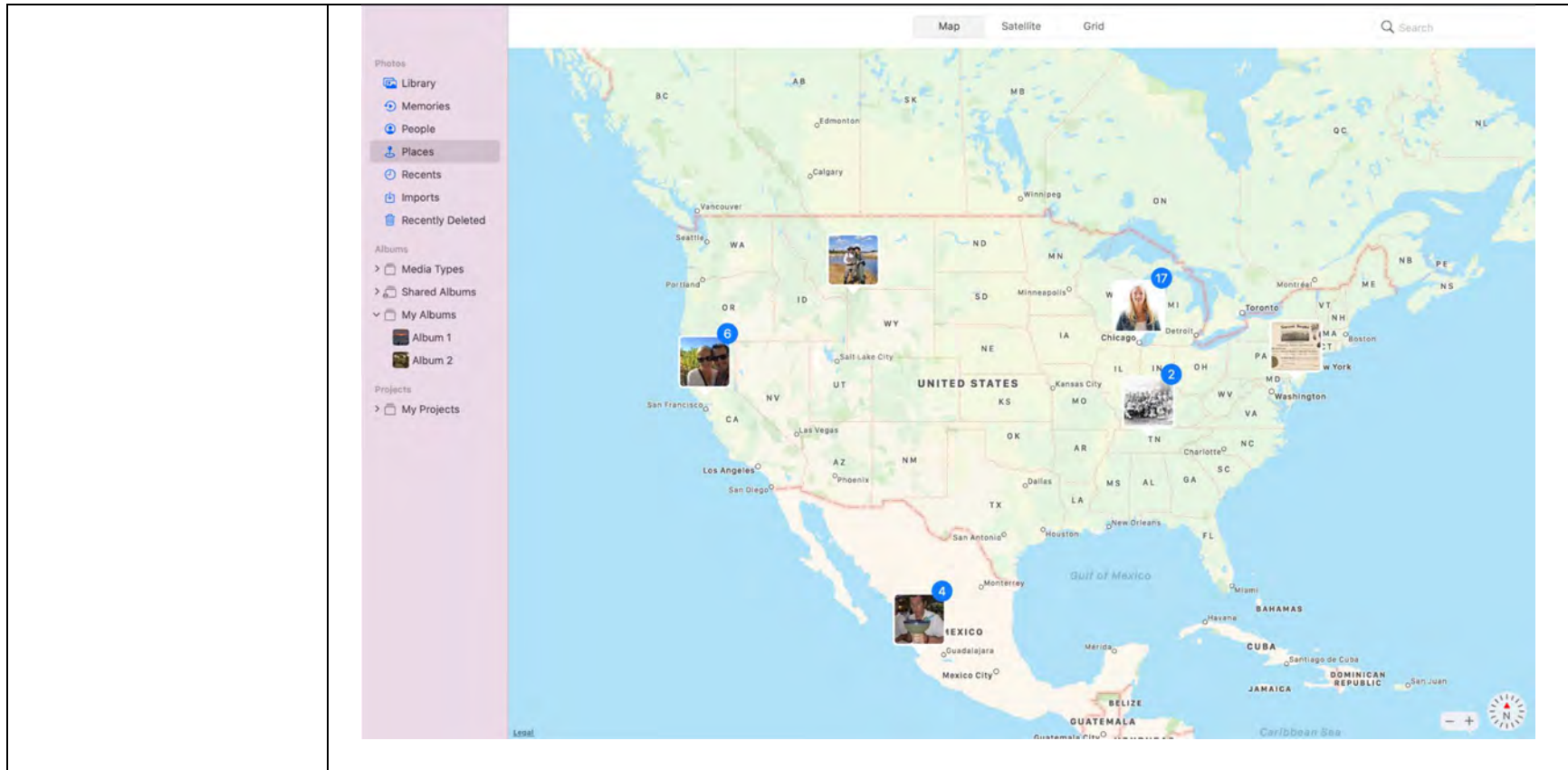
	
<p><b>6.</b> The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p>	<p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>

	 <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>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>

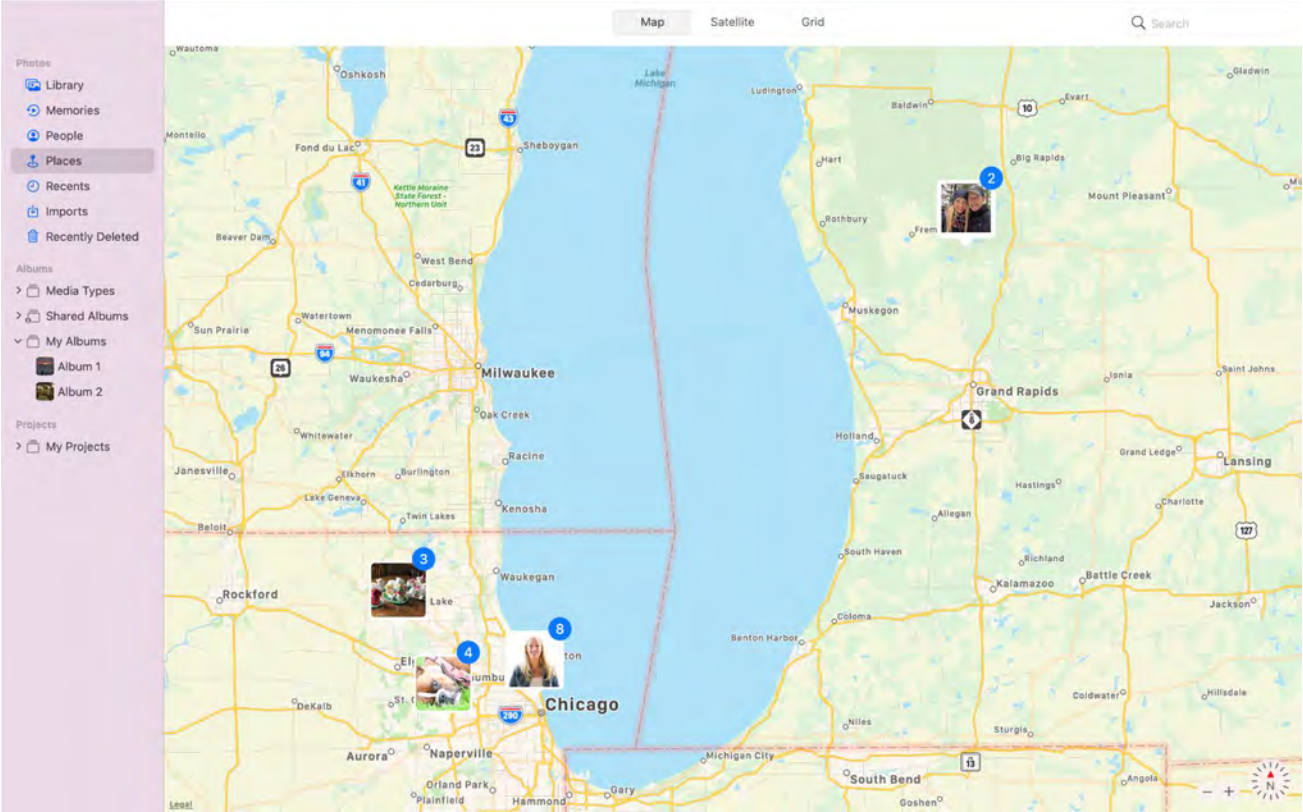


	 <p>The image shows a map interface with a location marked by a blue circle containing the number '2'. A red arrow points from the text 'second location selectable thumbnail image' to a white-bordered thumbnail image of two people. Another red arrow points from the text 'second indication feature' to the blue circle with the number '2'. The map shows locations like 'Frem' and 'Big Rapid'.</p>
<p><b>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>

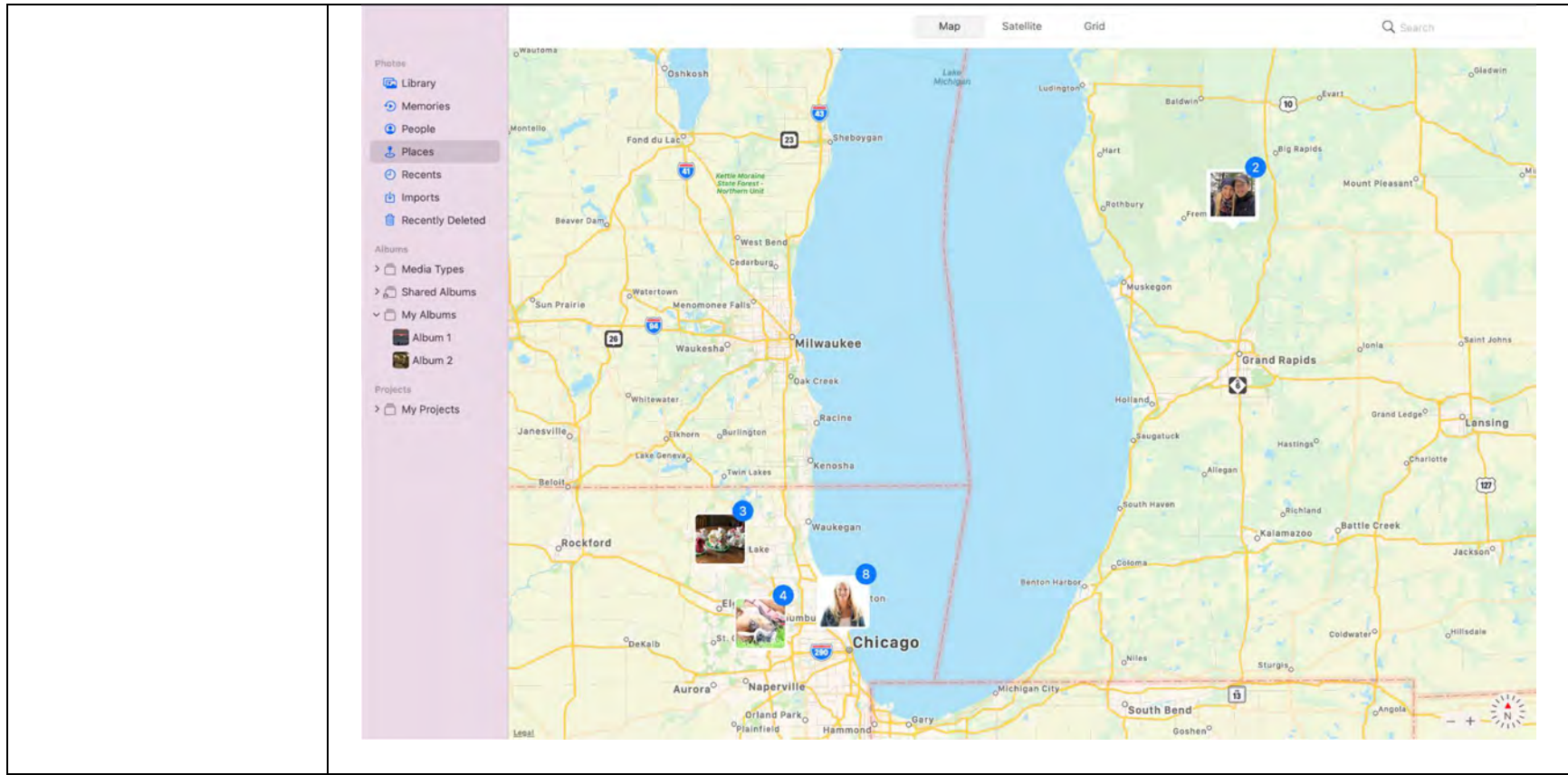
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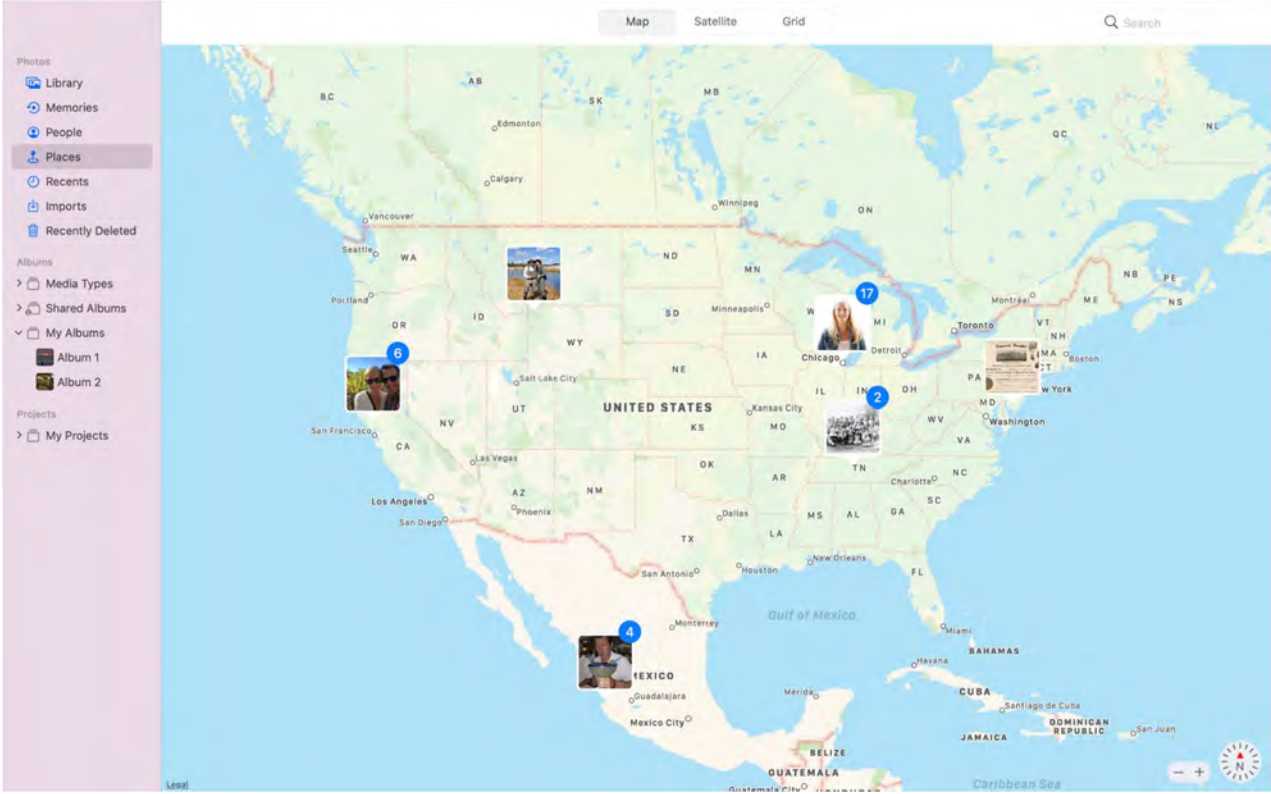
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

	
<p><b>9.</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 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>

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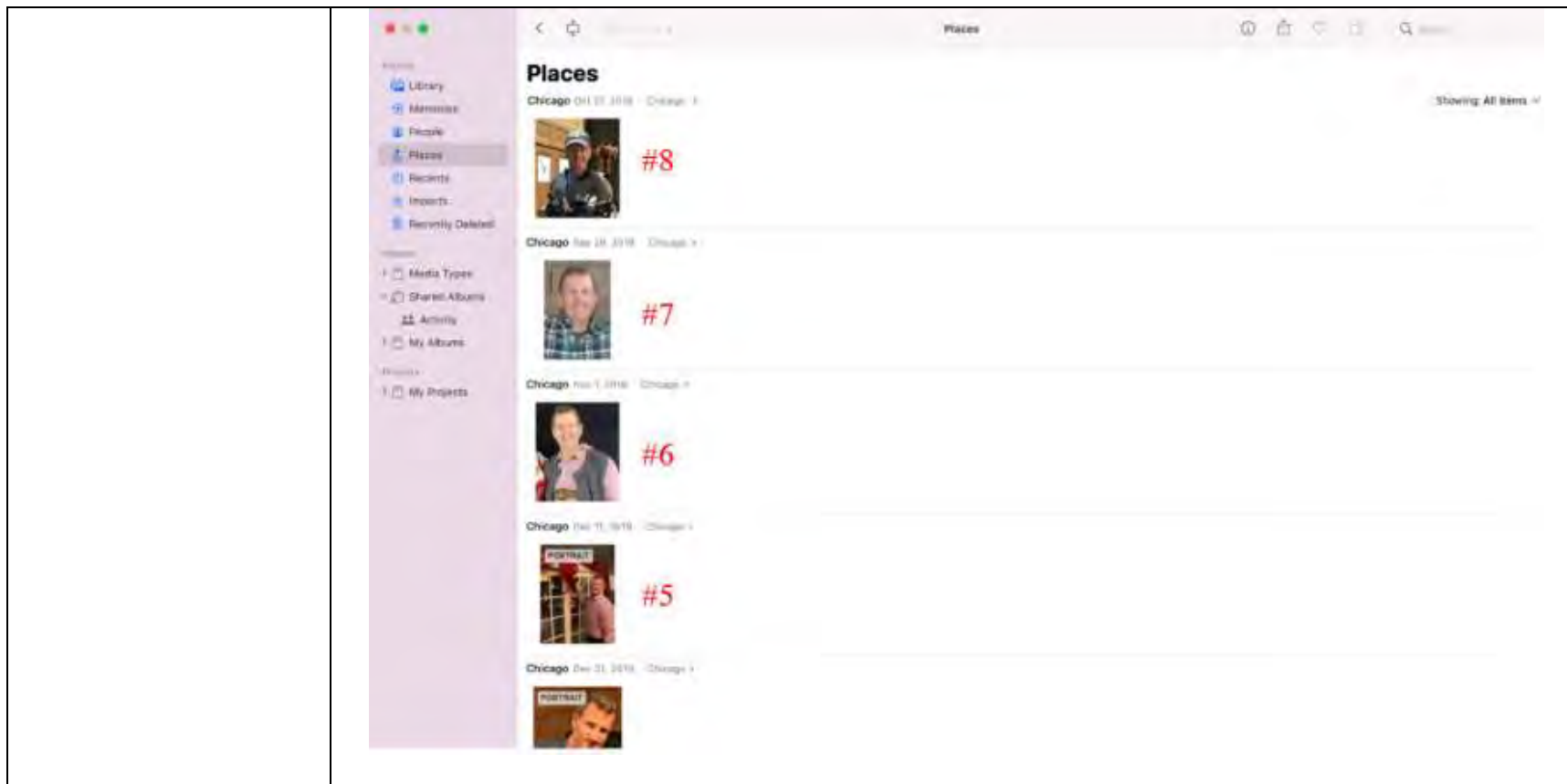


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Apple macOS

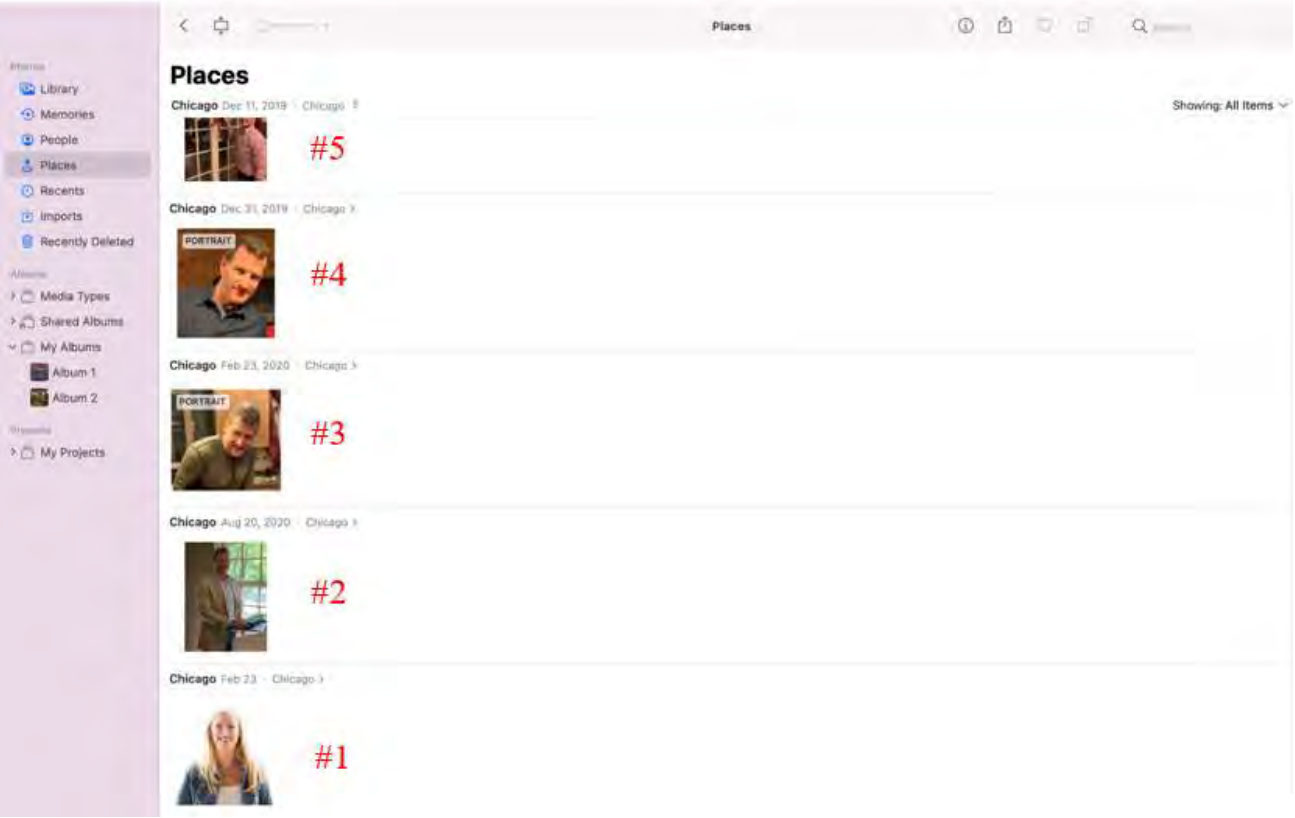
	
<p><b>12[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>12[a]</b> the first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files, and</p>	<p>The first location selectable thumbnail image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

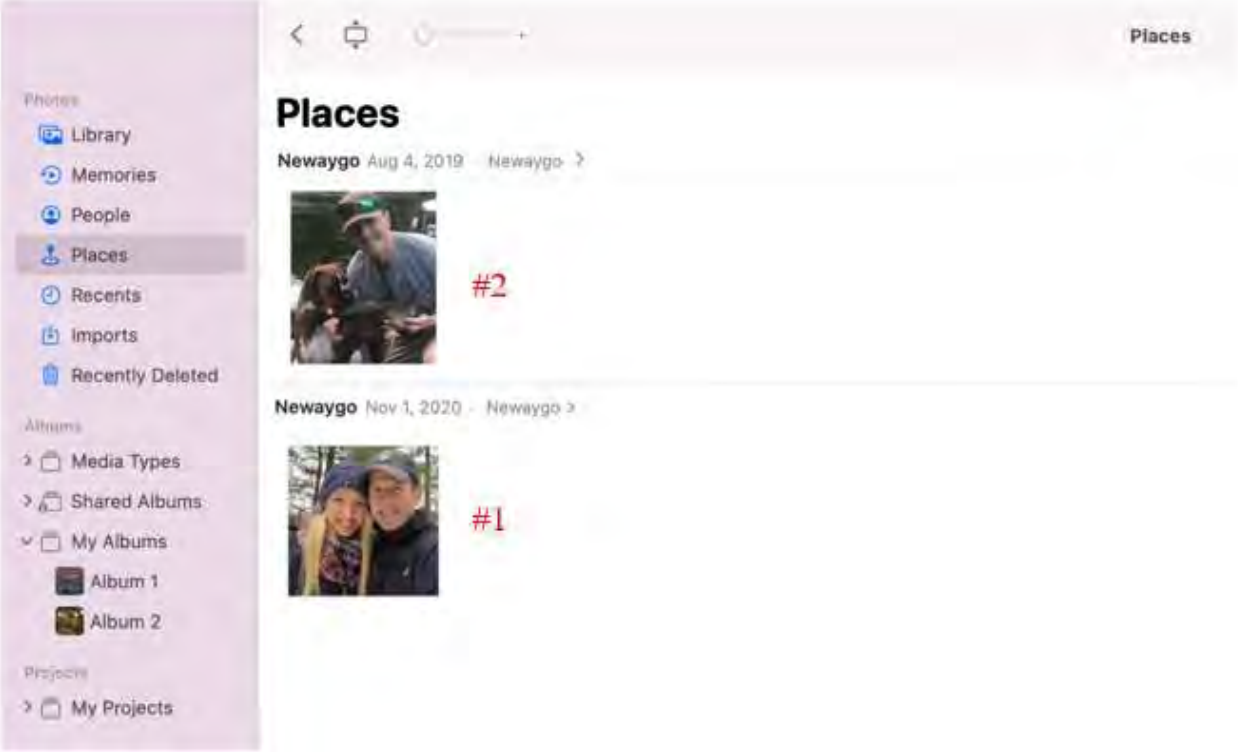
<p><b>12[b]</b> wherein the second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.</p>	<p>The second location selectable thumbnail image includes a representation of at least one of the digital files in the second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

	<p>The screenshot shows the 'Places' view in the Photos app. On the left is a sidebar with categories: Photos (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 map with two photo thumbnails. The top thumbnail is labeled 'Newwaygo Aug 4, 2019' and shows a man with a dog. The bottom thumbnail is labeled 'Newwaygo Nov 1, 2020' and shows a couple. A red arrow points from the text 'second location selectable thumbnail image' to a thumbnail of a couple on a map near 'Big Rapid'. Another red arrow points from the same thumbnail to a larger thumbnail of the same couple on the left side of the screen.</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><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>

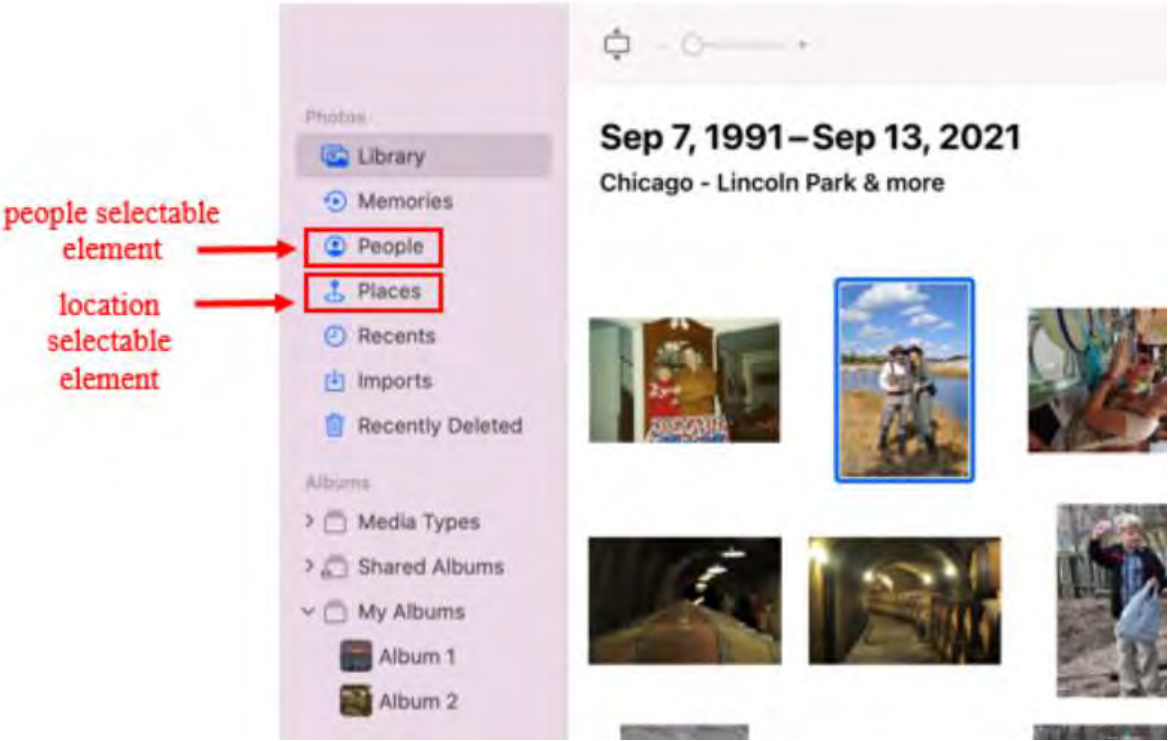
first digital file to be displayed on the interface; and



**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.

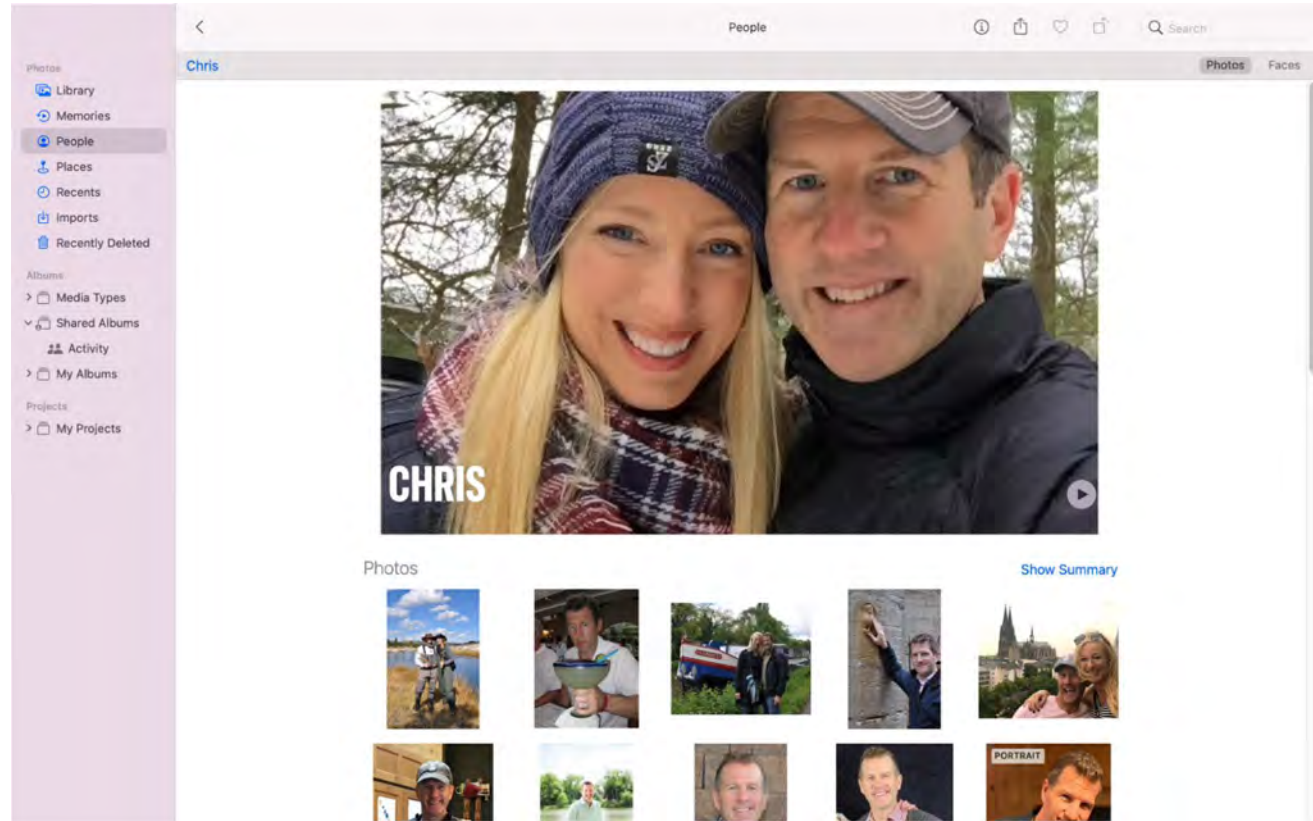
Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital files, the Apple Product causes a second digital file to be displayed on the interface.

	
<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>

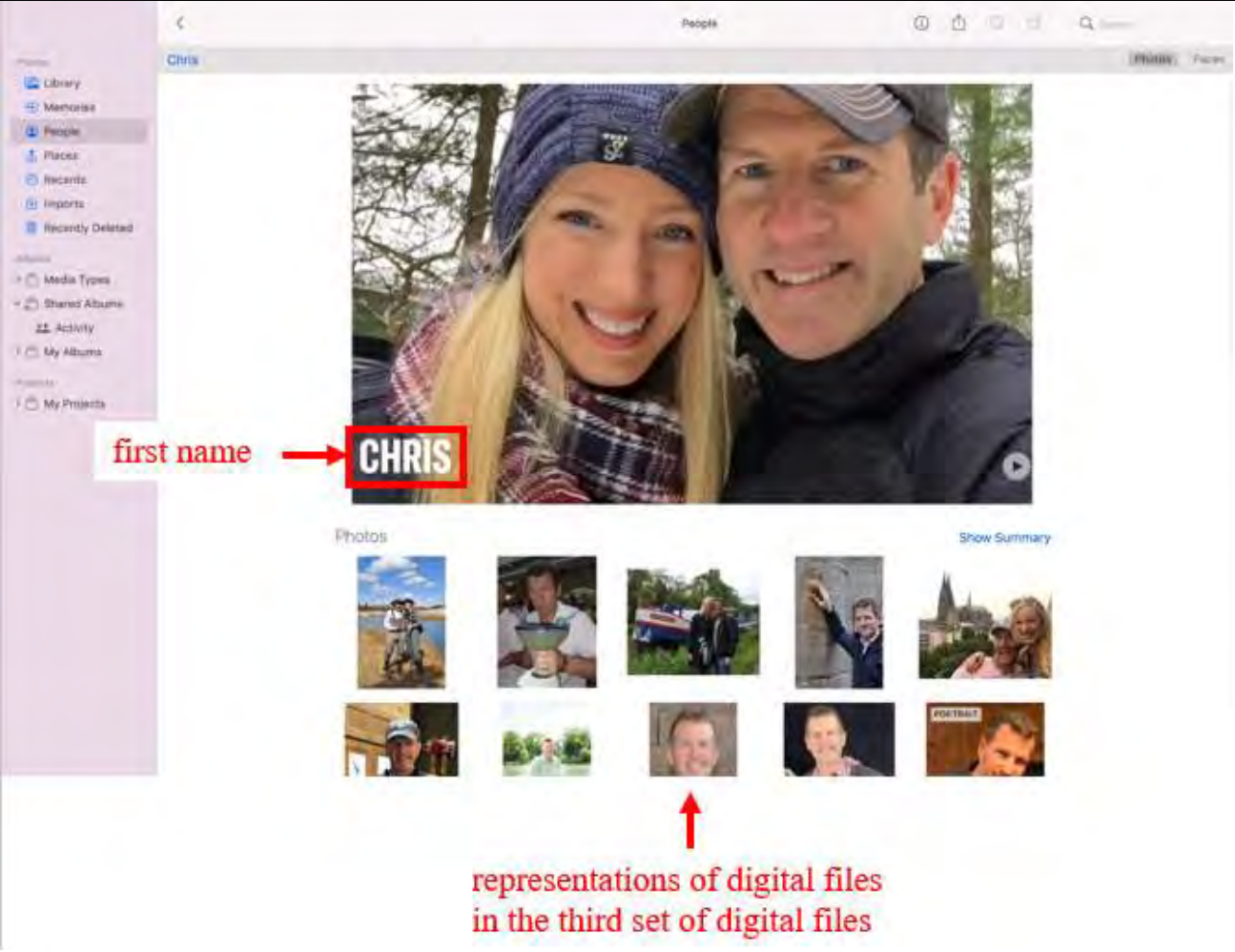
**18[a]** responsive to an input that is indicative of a selection of the first person selectable thumbnail image, causing a first person view to be displayed on the interface, the first person view including

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.

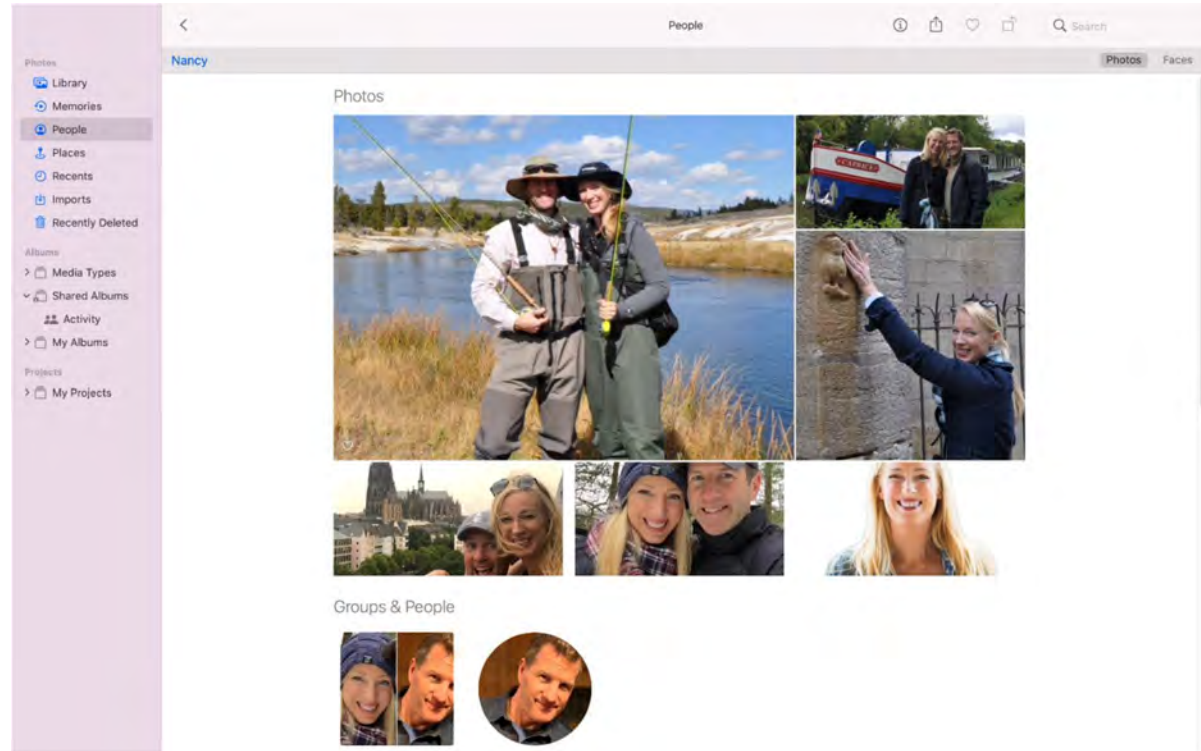


**18[b]** (i) the first name and (ii) a representation of each digital file in the third set of digital files.

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>

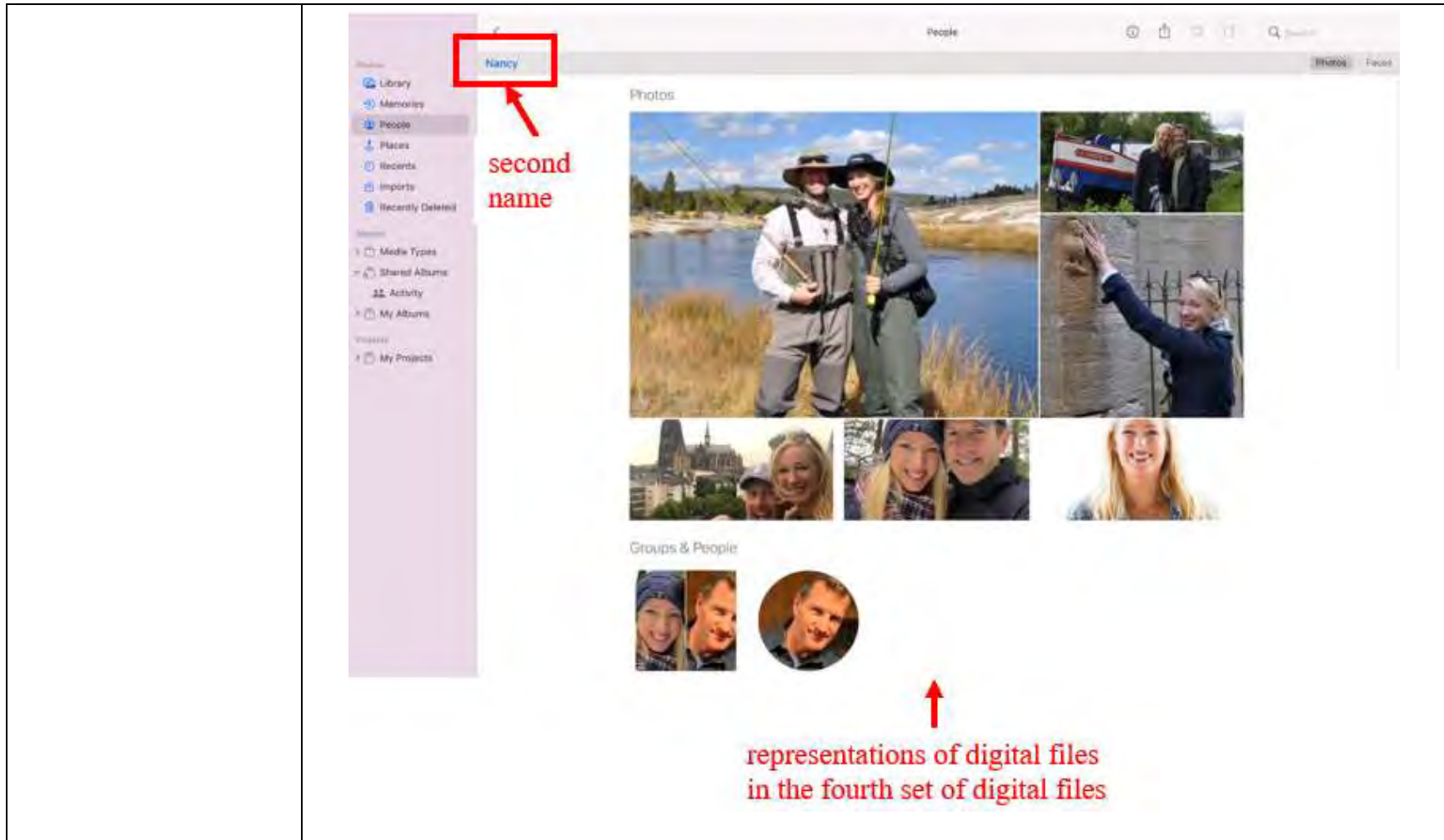
a selection of the second person selectable thumbnail image, causing a second person view to be displayed on the interface, the second person view including



**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.

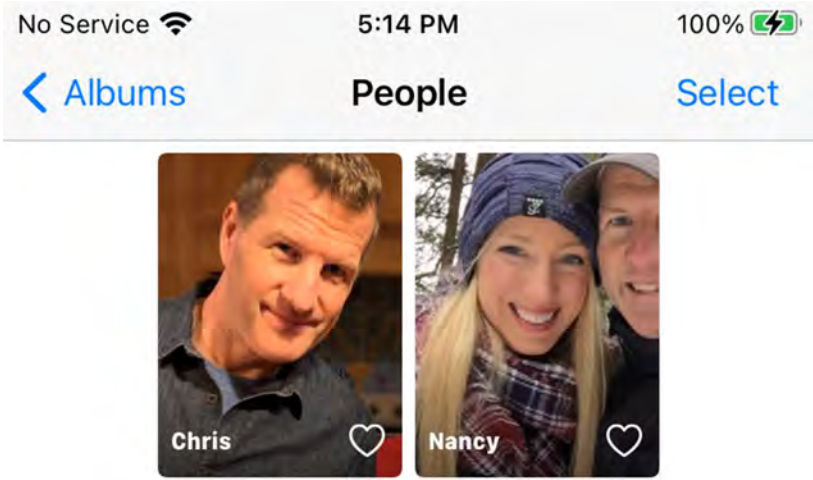


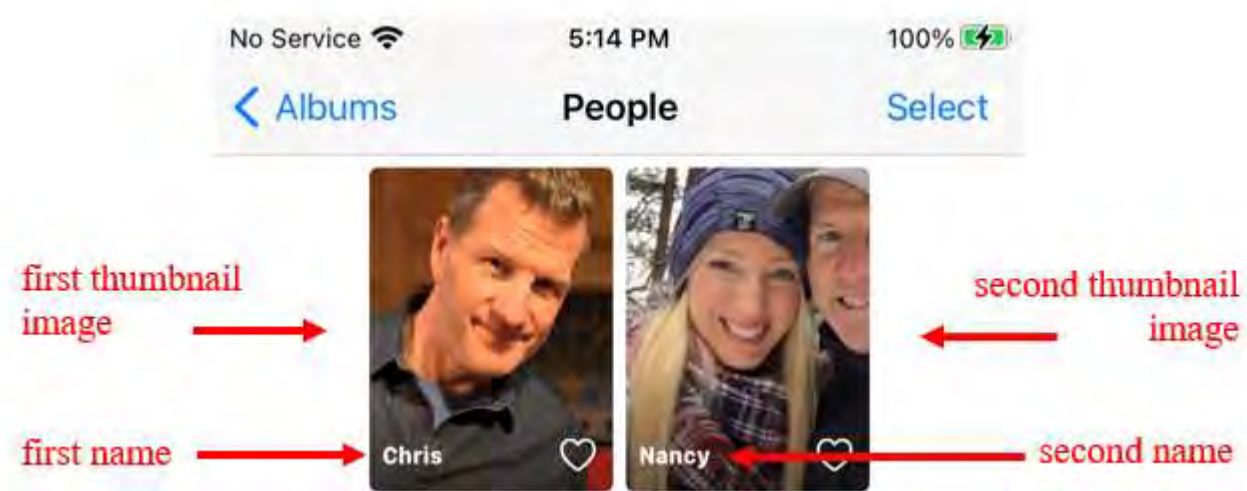


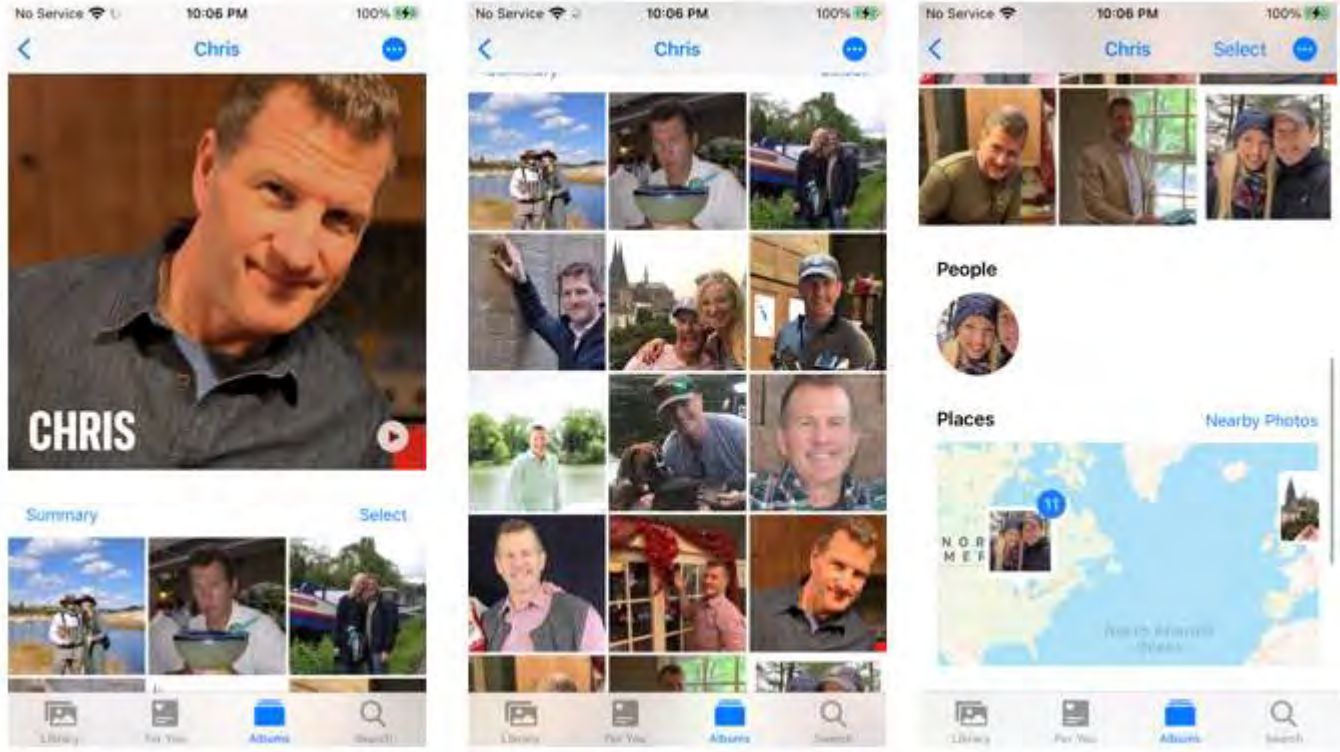
# **Exhibit D.1**

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

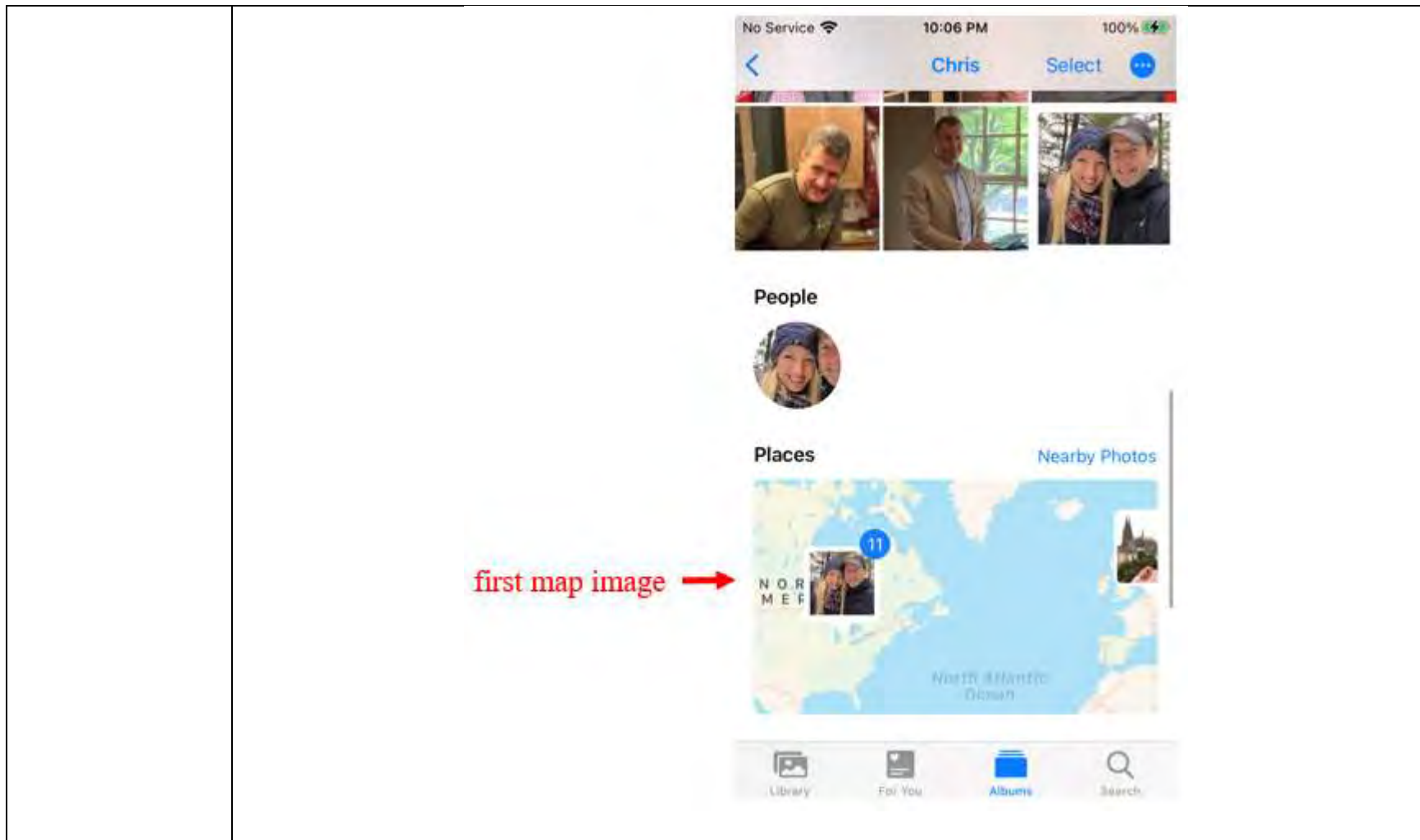
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,017,020 (“the ‘020 patent”) in Apple iOS (including the Photos and/or Files applications). The exemplary screenshots below were taken using an Apple iPhone 7 running iOS 14.7.1. While various 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: 'Chris' and 'Nancy'. Each person has a thumbnail image and a name label below it. Red arrows point from the text labels 'first thumbnail image', 'first name', 'second thumbnail image', and 'second name' to the corresponding elements in the screenshot.</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>

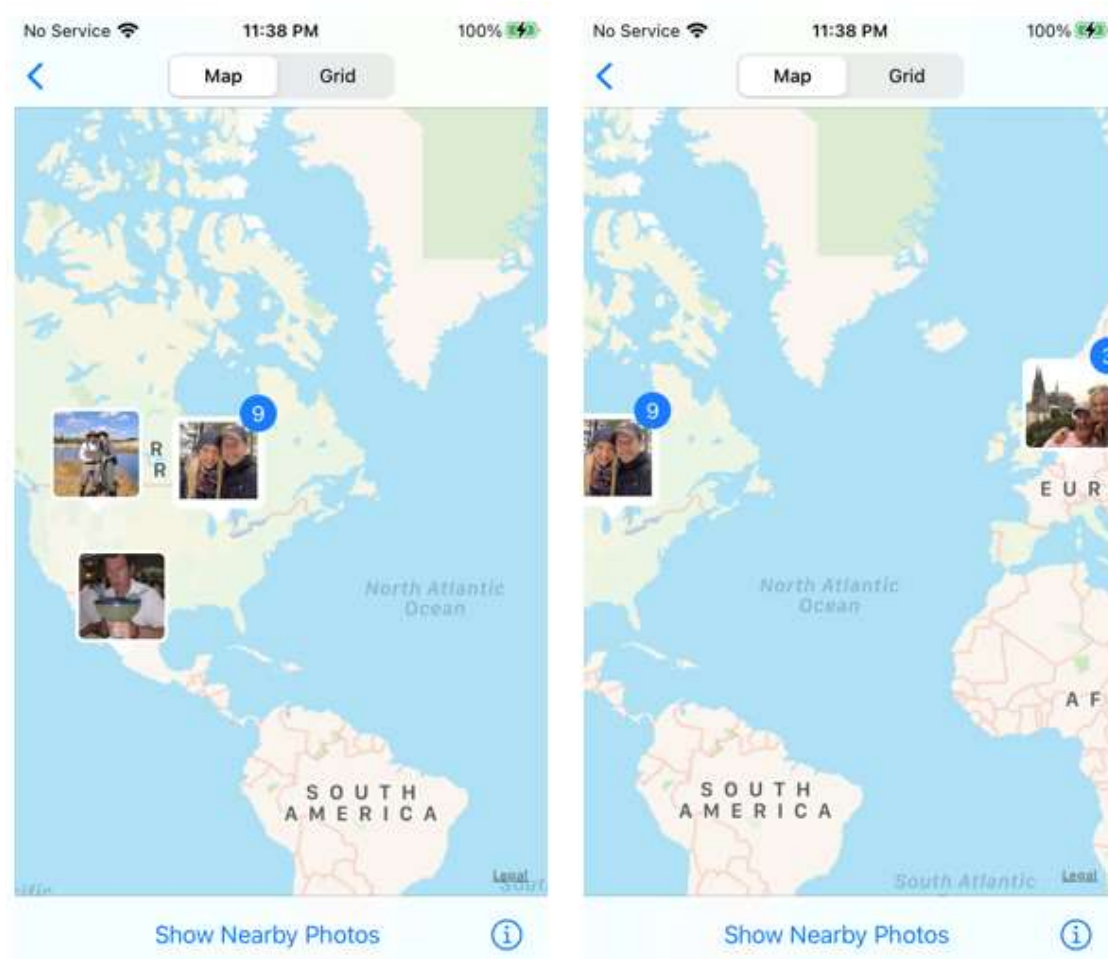
	 <p>The first person view includes a first digital file associated with the first person and the first name associated with the first person.</p>
<p><b>1[b](i)</b> a first digital file associated with the first person, <b>1[b](ii)</b> the first name associated with the first person, and</p>	

	 <p>The screenshot shows an iPhone contact page for a person named Chris. At the top, the status bar displays 'No Service', '10:00 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 the name 'CHRIS' overlaid in white text at the bottom left. A red arrow points from the text 'first name' above to the name 'Chris'. Another red arrow points from the text 'first digital file' to the portrait photo. A third red arrow points from the text 'first name' to the name 'CHRIS' on the photo. Below the photo are sections for 'Summary' and 'Select', each with a grid of three small thumbnail images. At the bottom is a dock 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,

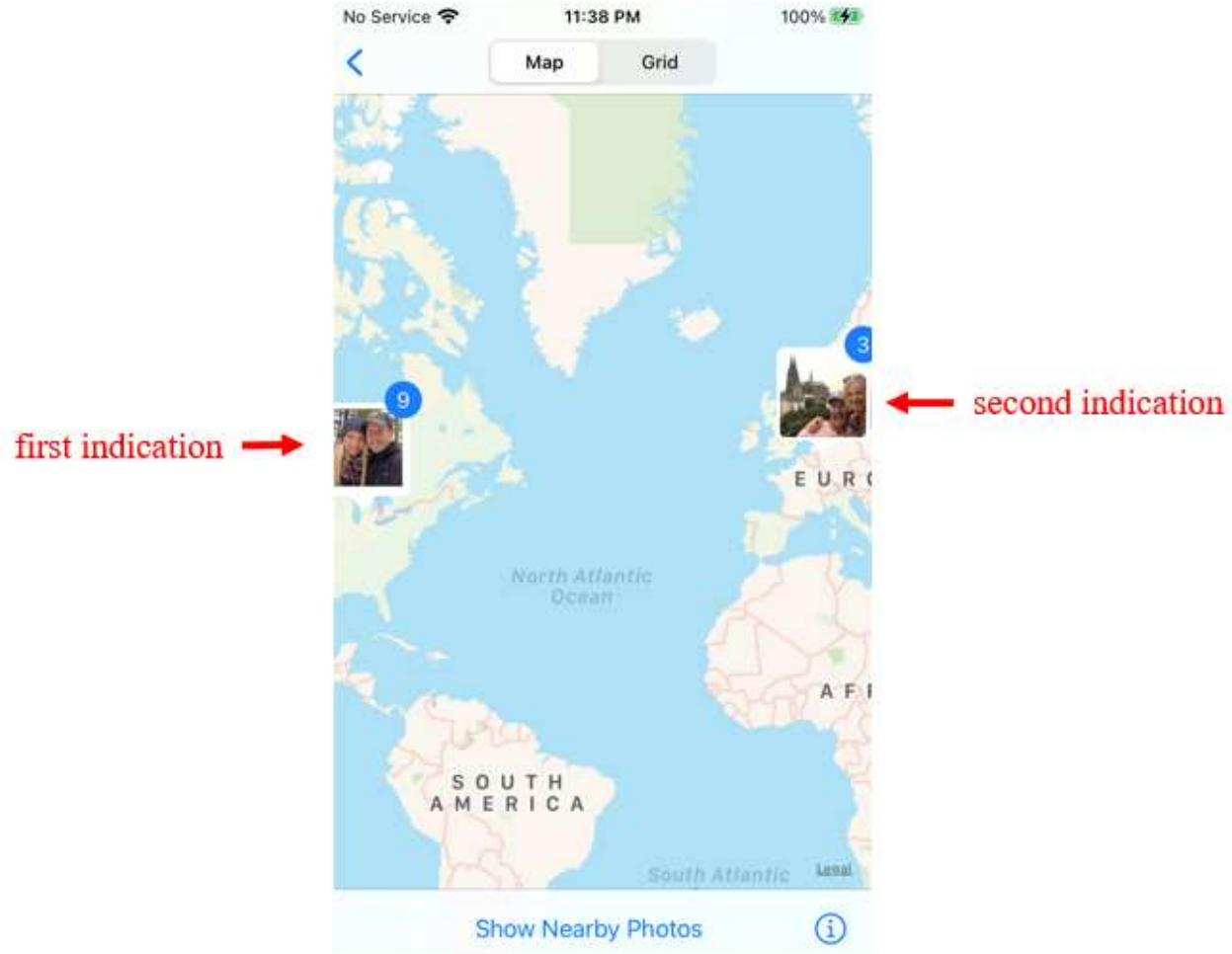
Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), iOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The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





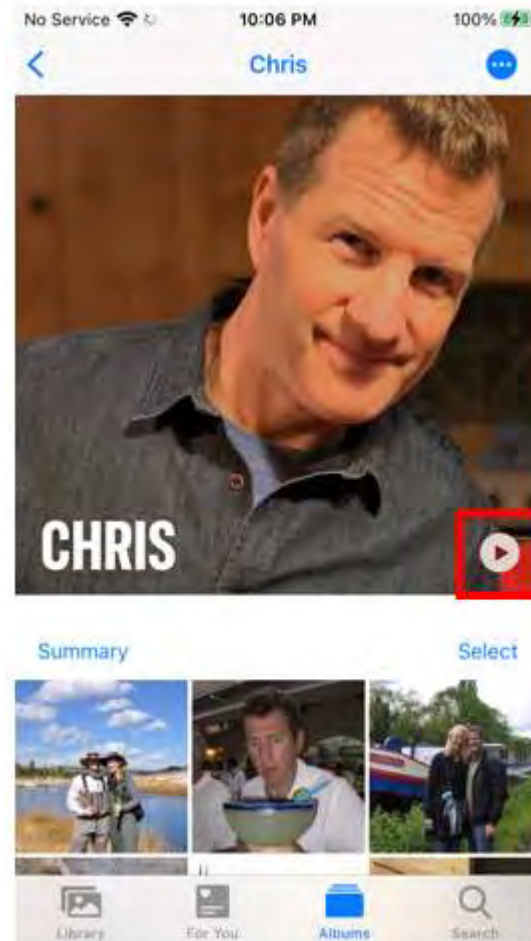
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map;  
and

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.

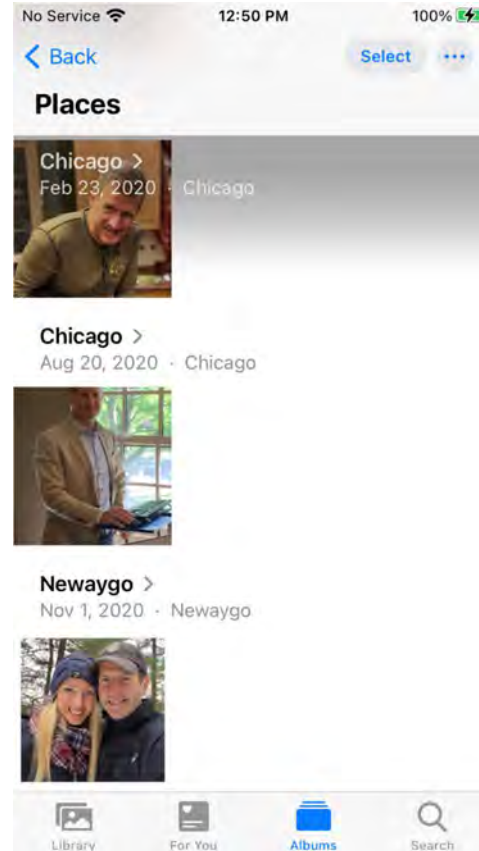
Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), iOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.



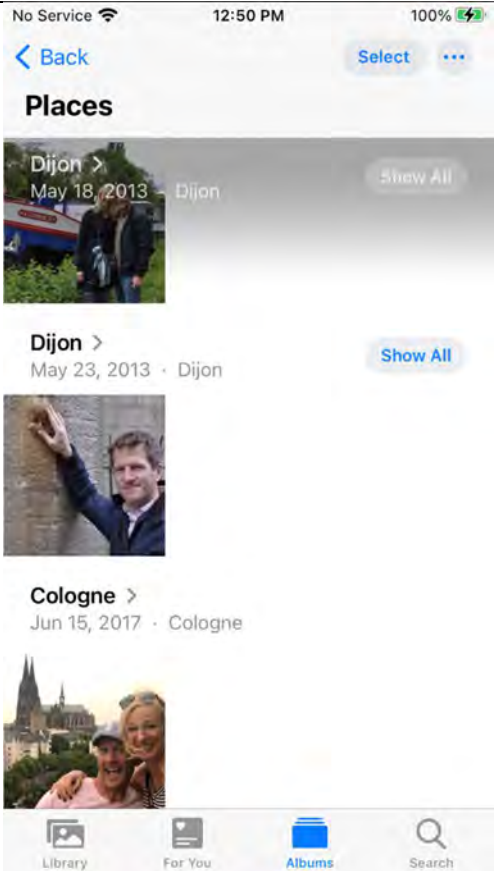
See MW Apple 003185 for an exemplary slideshow.

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.

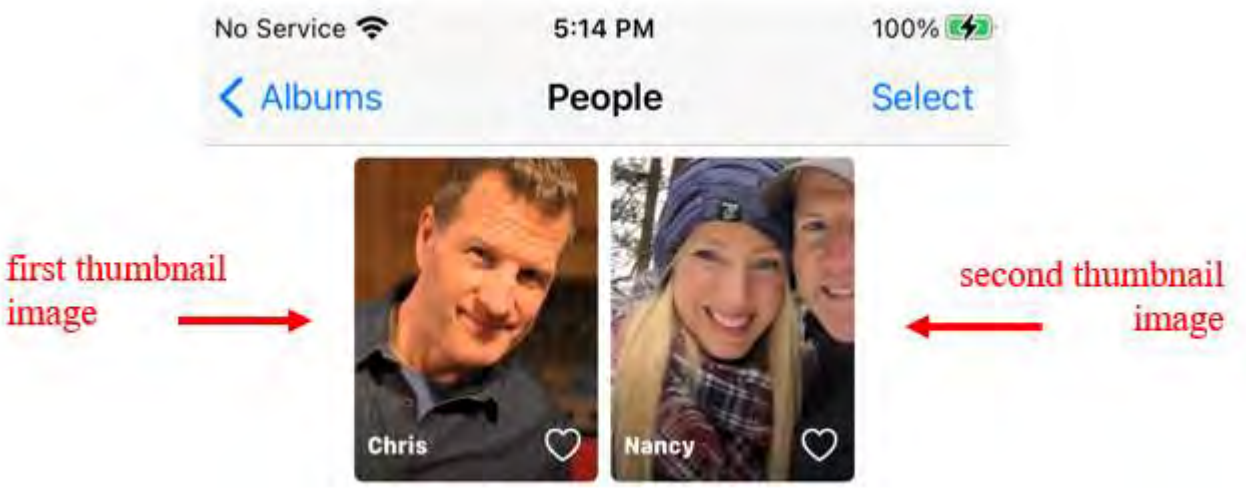
The first indication is associated with a first set of digital files and the first location. For example, iOS causes the view below to be displayed responsive to a selection of the first indication.



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.

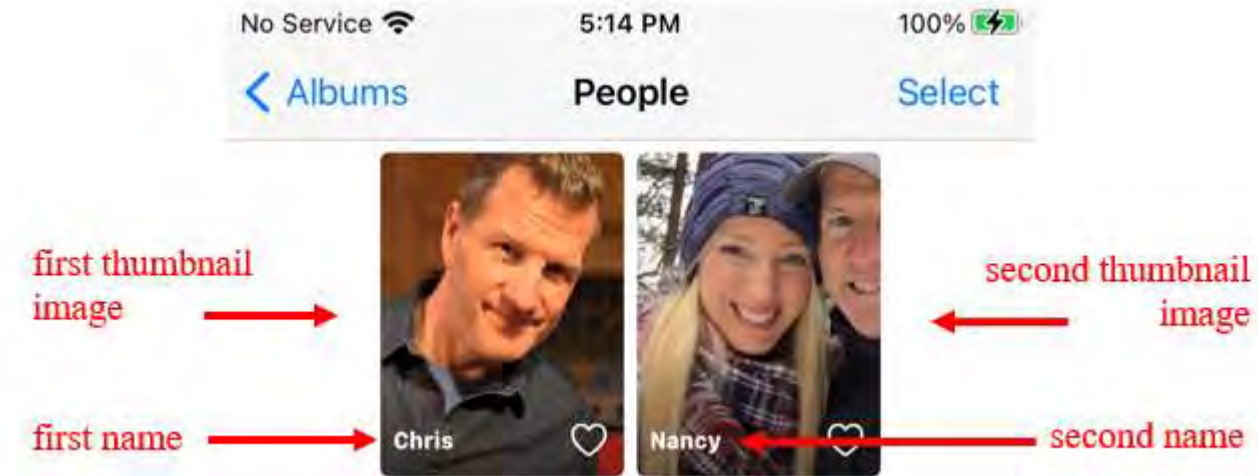
	
<p><b>3.</b> The method of claim 2, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first and second sets 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 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. 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.



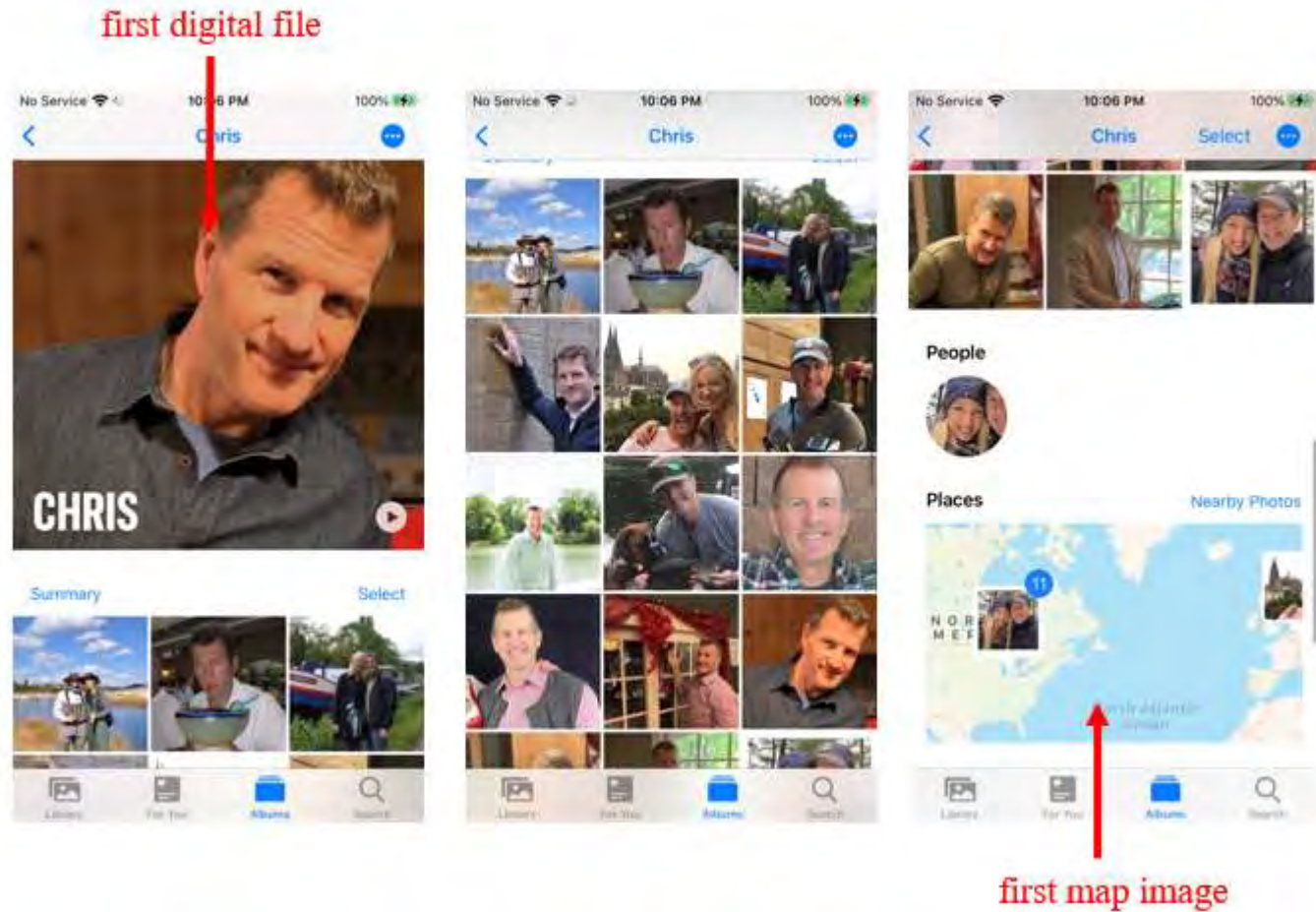
To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

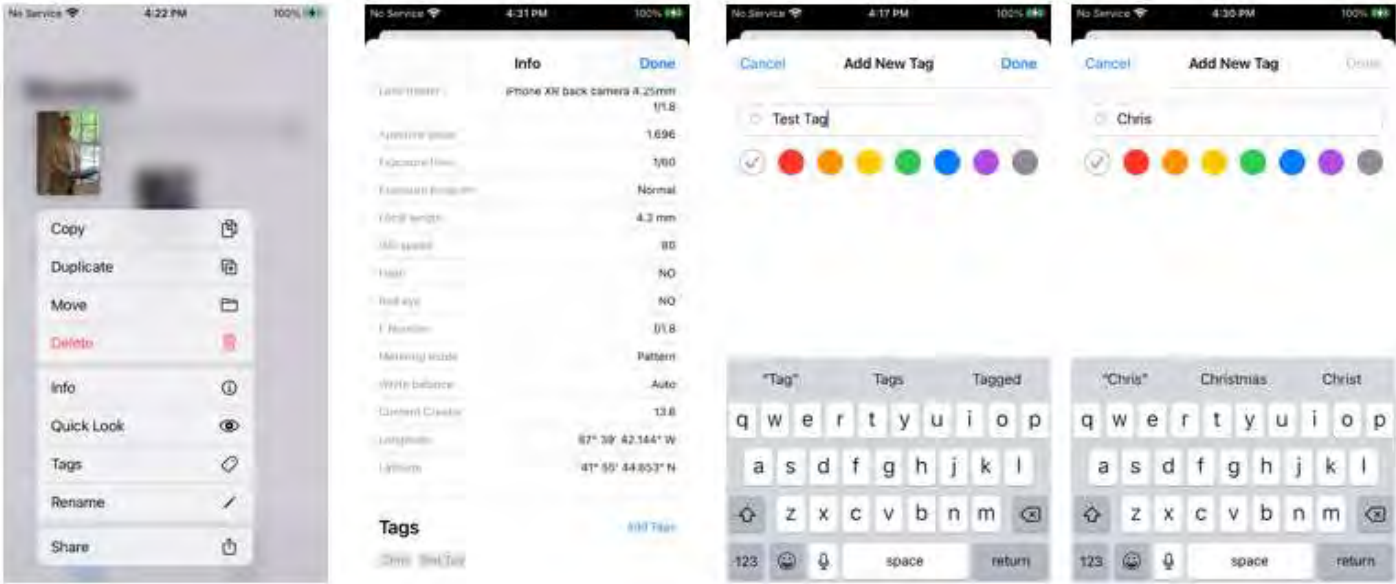


8[pre] The method of claim 1, further comprising, prior

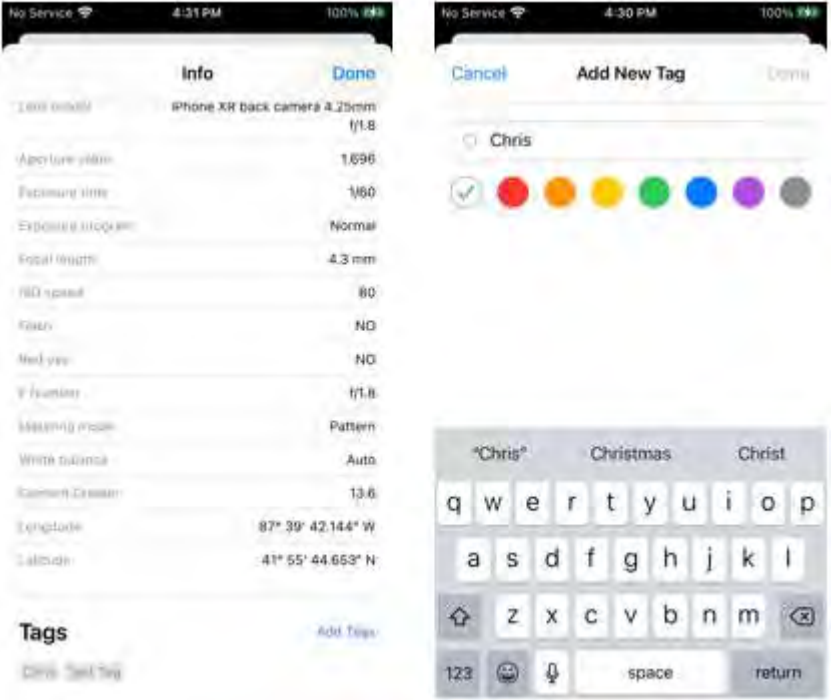
See information for claim 1.

<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>

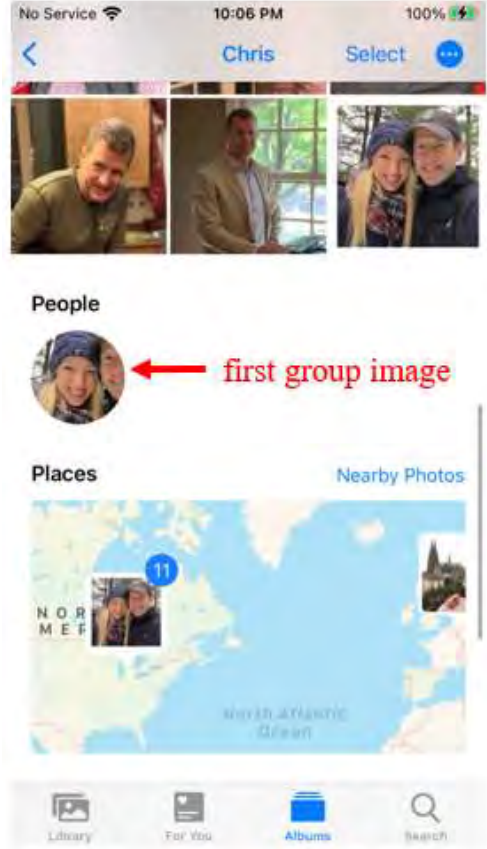
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS


	 <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>

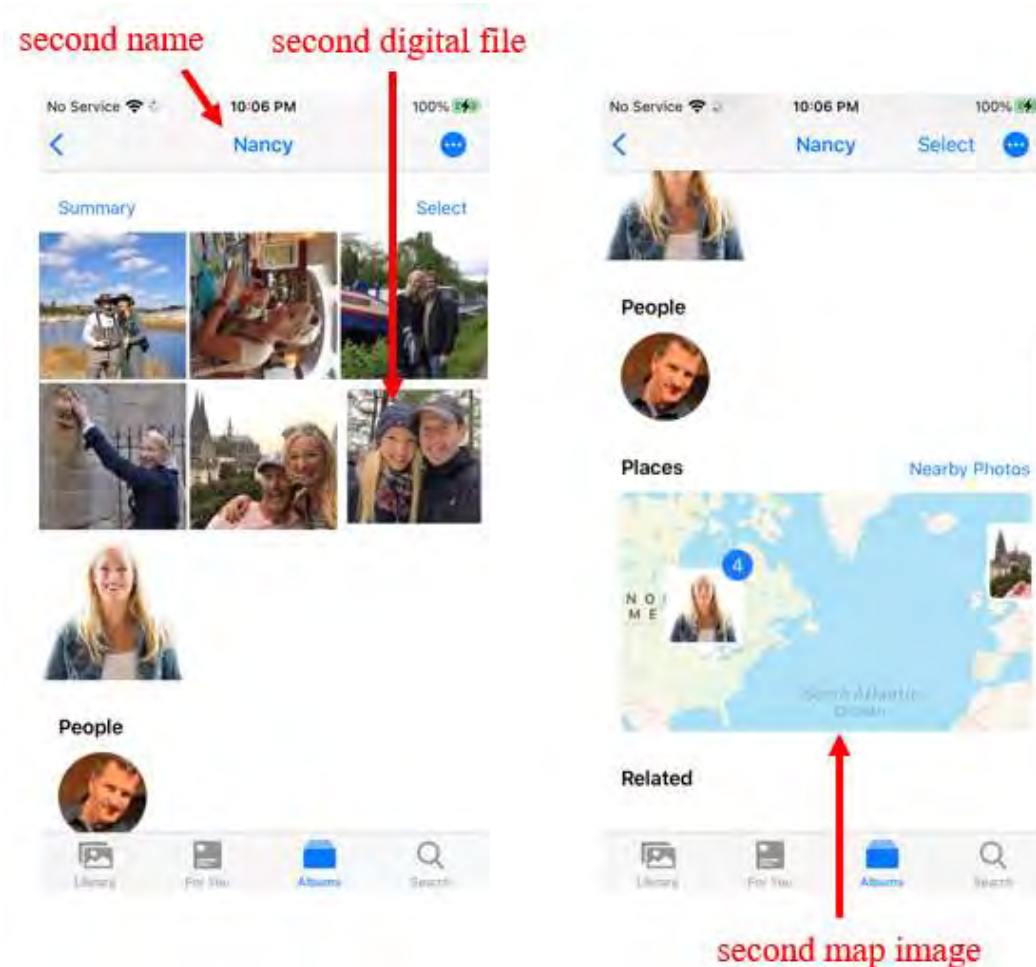
	 <p>The screenshot shows an iPhone photo gallery interface for a contact named "Chris". At the top, there are three photo thumbnails. Below them is a "People" section with a circular profile picture of a woman. A red arrow points to this profile picture with the text "first group image". Below the profile picture is a "Places" section with a map of North America and a "Nearby Photos" link. At the bottom is a navigation bar with icons for 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>

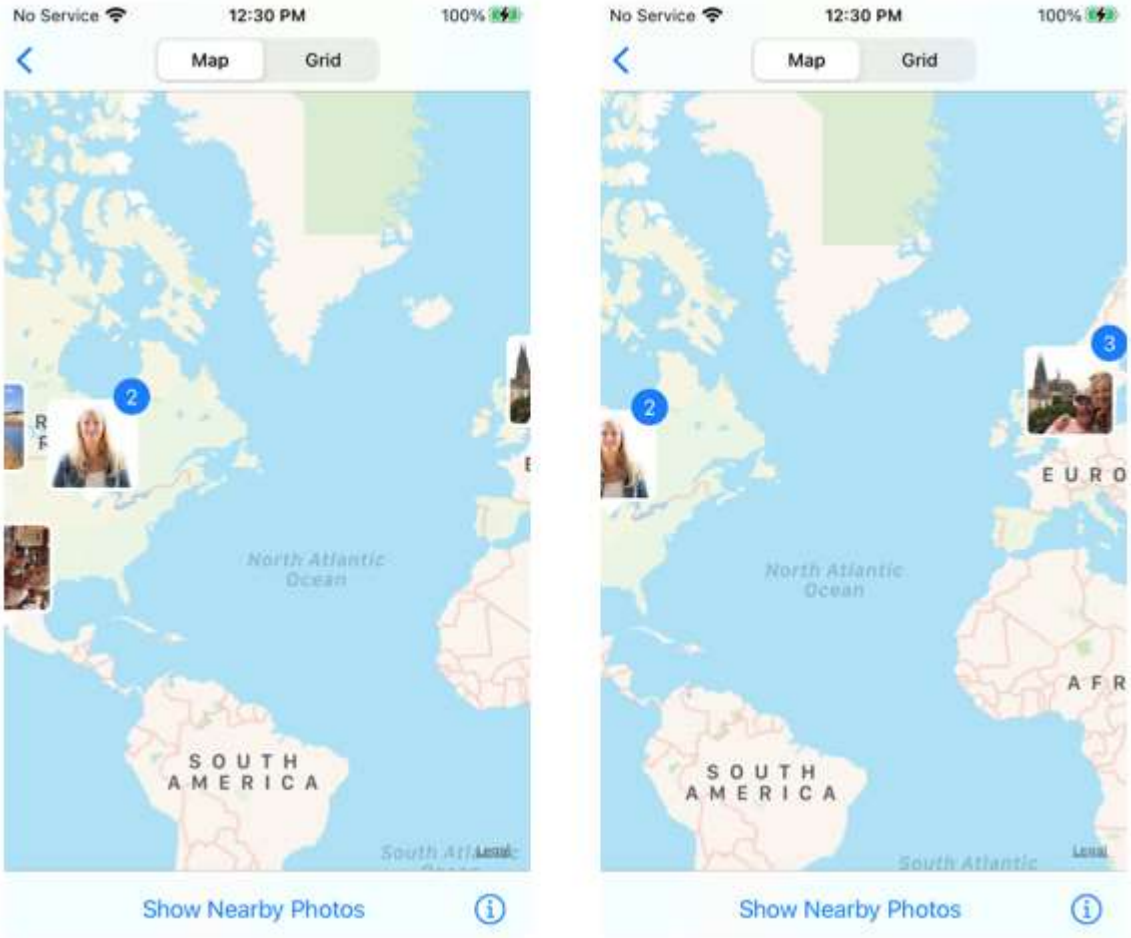


**13.** The method of claim 3, further comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the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

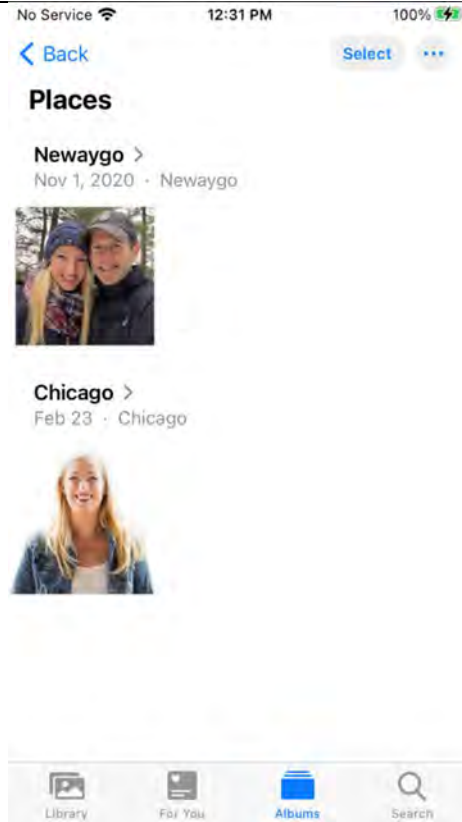


<p><b>14[pre]</b> The method of claim 13, further comprising:</p>	<p><i>See</i> information for claim 13.</p>
<p><b>14[a]</b> responsive to an input that is indicative of a selection of the second map image in the second person view, causing a second location view to be displayed on the interface, <b>14[b]</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>

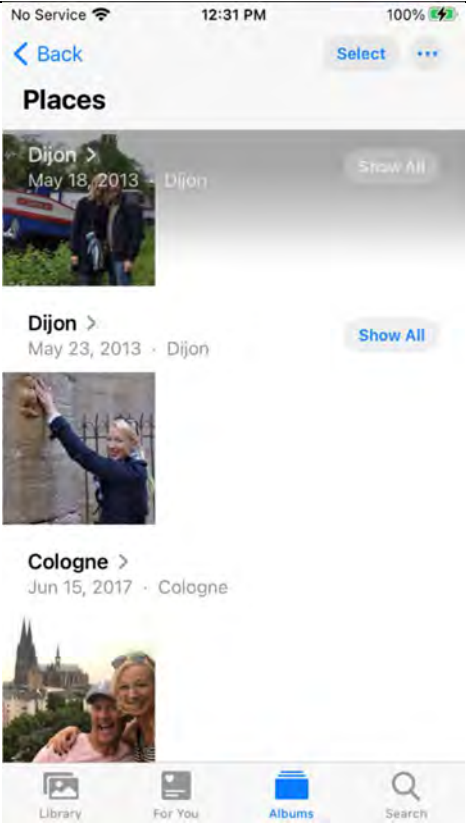
	 <p>The image displays two side-by-side screenshots of an iOS map application. Both screenshots show a world map centered on the North Atlantic Ocean. The top status bar of each screenshot indicates 'No Service', '12:30 PM', and '100%' battery. Below the status bar, there are navigation buttons for 'Map' and 'Grid'. The map shows several photo thumbnails with blue circular indicators containing numbers. In the left screenshot, there are two indicators: a '2' next to a photo of a woman and another '2' next to a photo of a building. In the right screenshot, there are three indicators: a '2' next to the woman's photo, a '3' next to a photo of a building, and another '3' next to a 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>

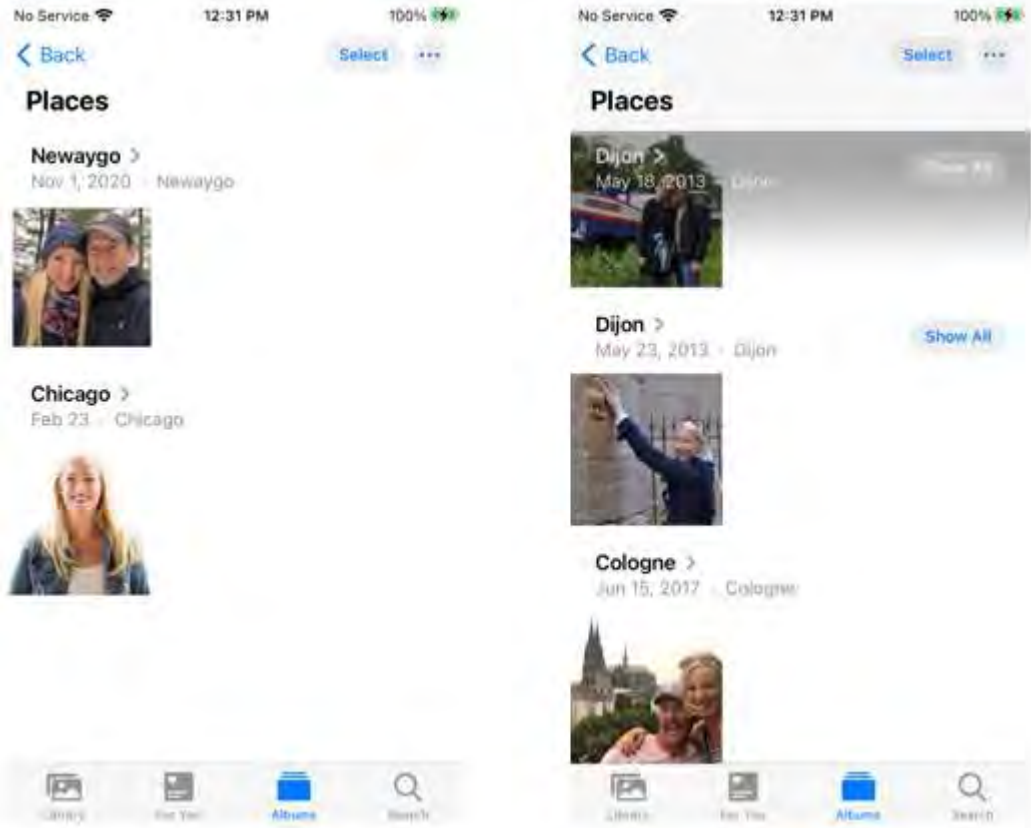
<p>geographic map, and <b>14[d]</b> a fourth indication positioned at a fourth location on the interactive geographic map.</p>	
<p><b>15.</b> The method of claim 14, wherein the third indication is associated with a third set of digital files and</p>	<p>The third indication is associated with a third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

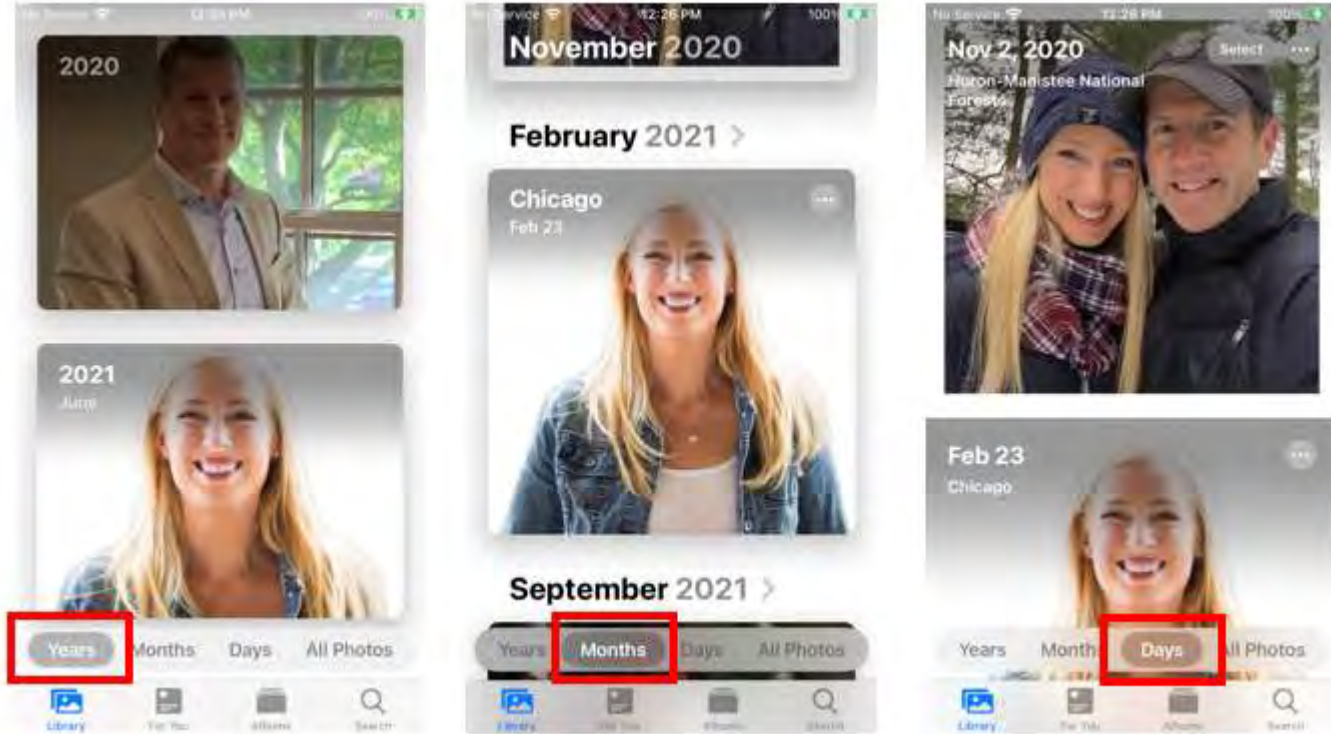
the third location, and the fourth indication is associated with a fourth set of digital files and the fourth location.




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 title 'Places', 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>

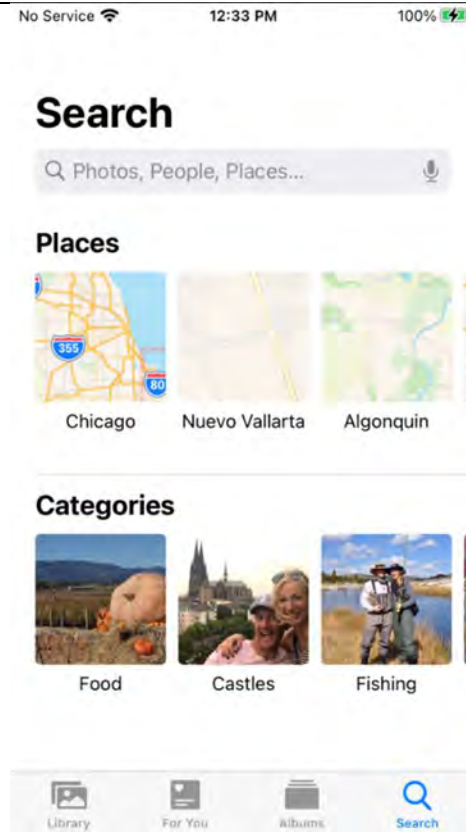
<p>permitting a user to group a plurality of digital files by year, month, and day.</p>	 <p>The image displays three screenshots of the iOS Photos app interface. The first screenshot shows a gallery for the year 2020 with a photo of a man in a tan jacket, and a gallery for the year 2021 with a photo 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>



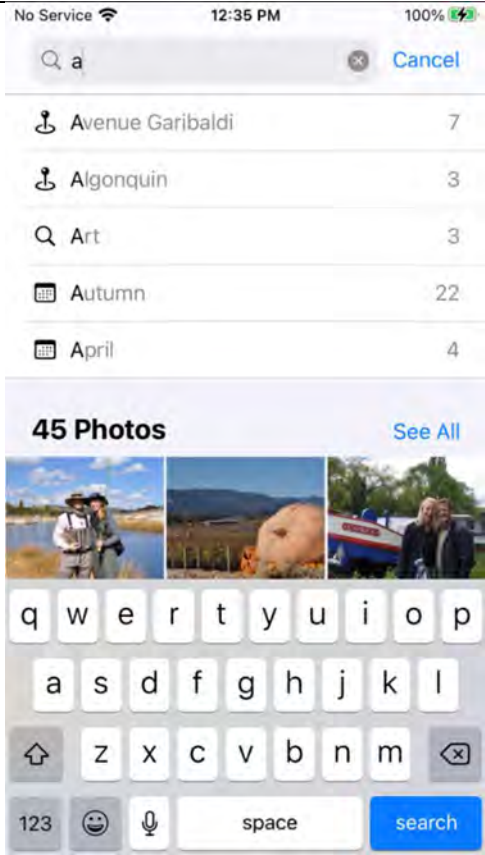
<p>and causing at least one of the plurality of digital files to be displayed on the interface;</p>	
<p><b>18[b]</b> responsive to receiving a month input, grouping the plurality of digital files based on month and causing at least one of the plurality of digital files to be displayed on the interface; 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>

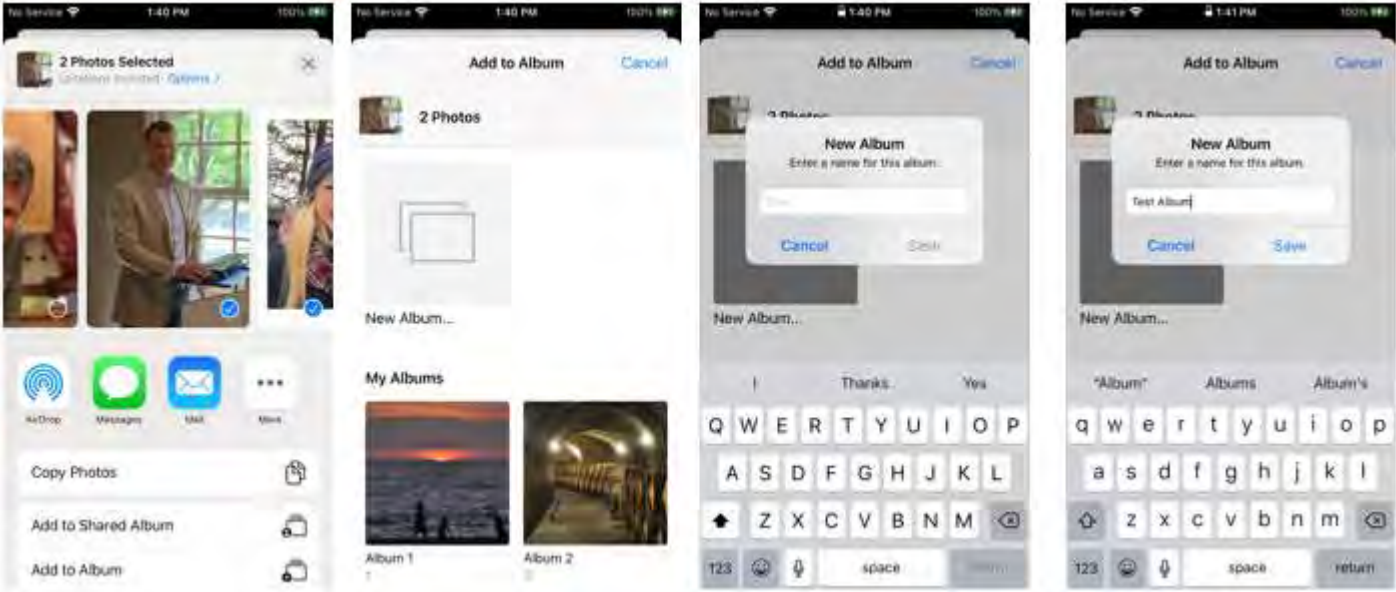
	
<p><b>19.</b> The method of claim 1, further comprising receiving one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.</p>	<p>iOS receives one or more filtering criteria and causing one or more 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>

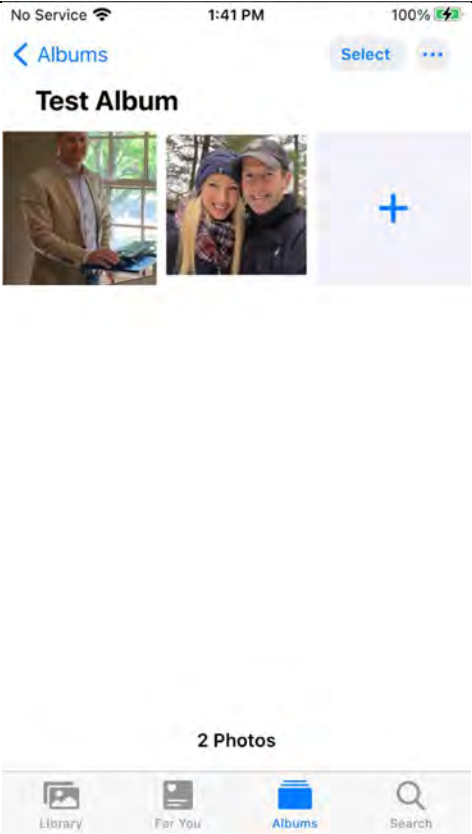


Further, iOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion causes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

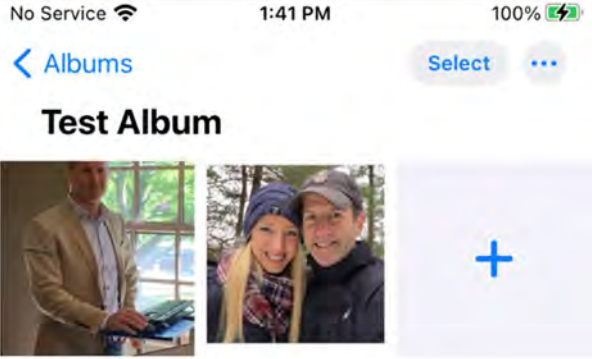
	 <p>The screenshot shows an iOS search interface. At the top, the status bar displays 'No Service', '12:35 PM', and '100%' battery. Below the status bar is a search bar with the letter 'a' entered and a 'Cancel' button. The search results are listed as follows:</p> <ul style="list-style-type: none"> <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 '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>

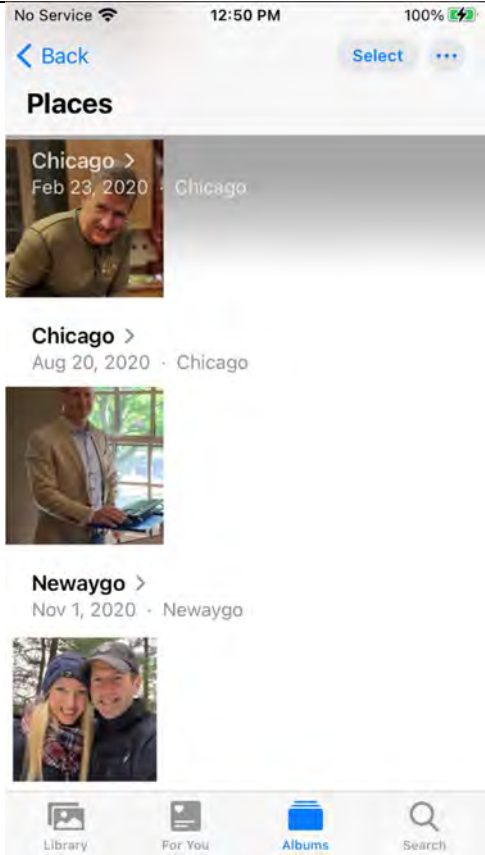
<p><b>20[a]</b> causing a plurality of images to be displayed on the interface;</p>	<p>iOS causes a plurality of images to be displayed on the interface.</p>  <p>The screenshot shows an iOS photo gallery interface. At the top, it displays the date 'Feb 23, 2020' and the location 'Chicago - Lincoln Park'. Below this is a grid of photos. A red box highlights a selection of three photos in the middle row. 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>

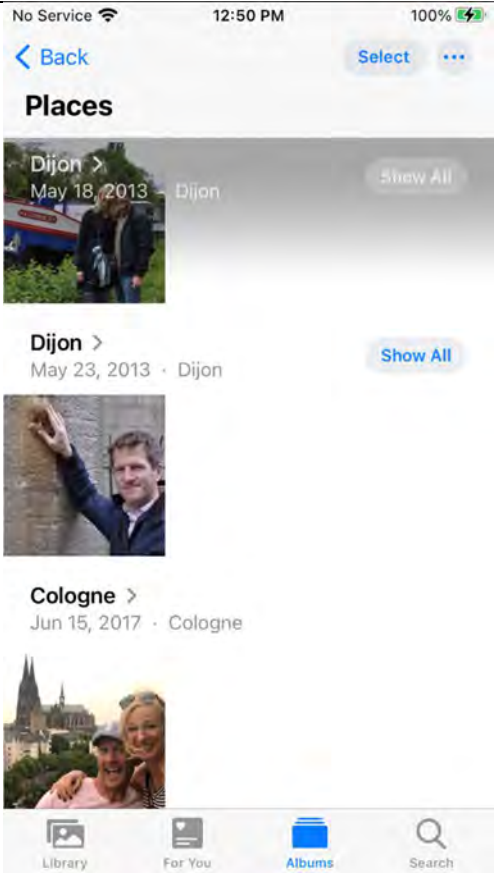
	 <p>The image consists of four sequential screenshots of the iOS Photos app interface, illustrating the process of creating a new album from a selection of photos. The first screenshot shows a selection of two photos with the 'Add to Album' option highlighted. The second screenshot shows the 'Add to Album' dialog box with a 'New Album...' option. The third screenshot shows the 'New Album' dialog box with a text input field and a keyboard. The fourth screenshot shows the 'New Album' dialog box with the text 'Test Album' entered in the input field.</p>
<p><b>20[c]</b> 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>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 thumbnails 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>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>

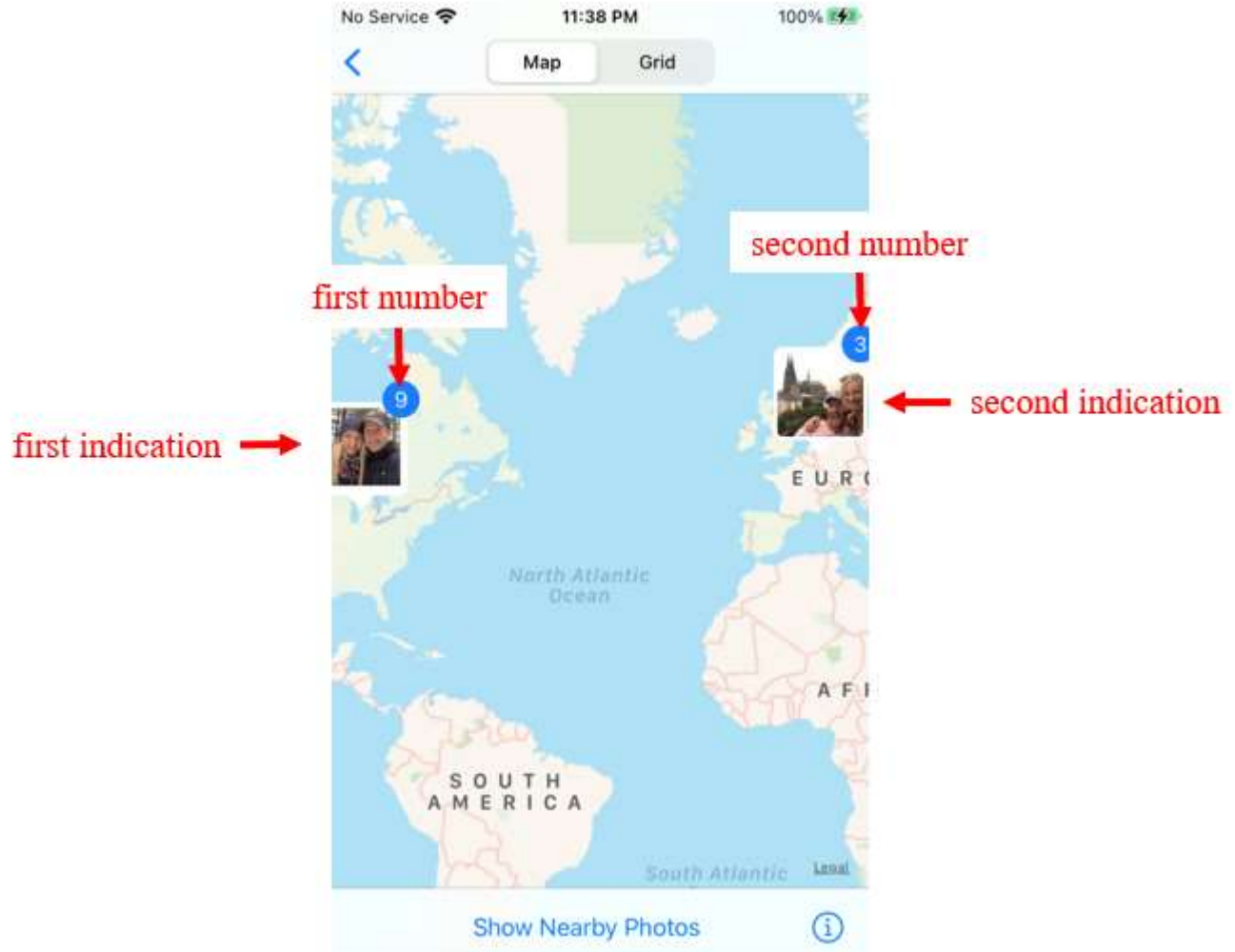


	
<p><b>21[pre]</b> The method of claim 2, further comprising</p>	<p><i>See information for claim 2.</i></p>
<p><b>21[a]</b> responsive to a selection associated with the first location, causing the first set of digital files to be displayed on the interface and</p>	<p>Responsive to a selection associated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

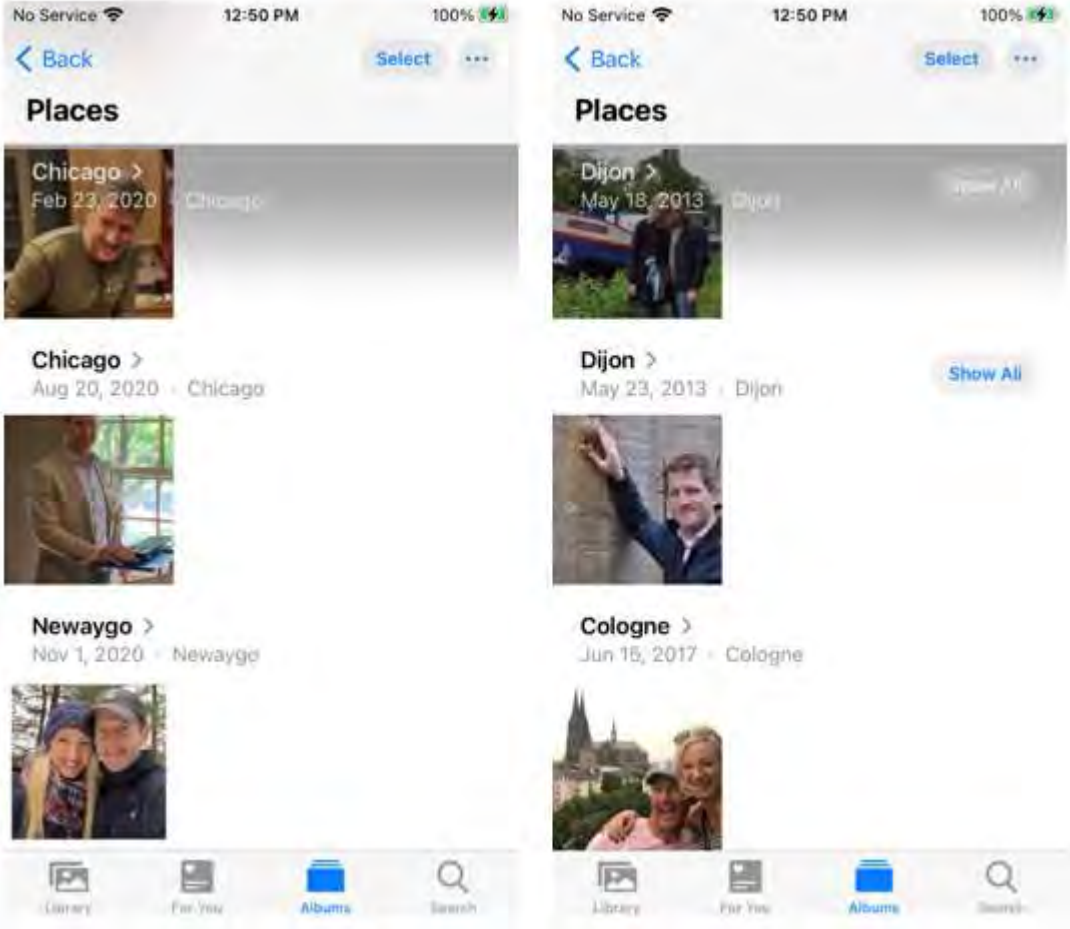
	
<p><b>22.</b> The method of claim 21, further comprising causing (i) a first number associated with a number of digital files in the first set of digital files</p>	<p>The first location view displayed by iOS includes (i) a first number associated with a number of digital files in the first set of digital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

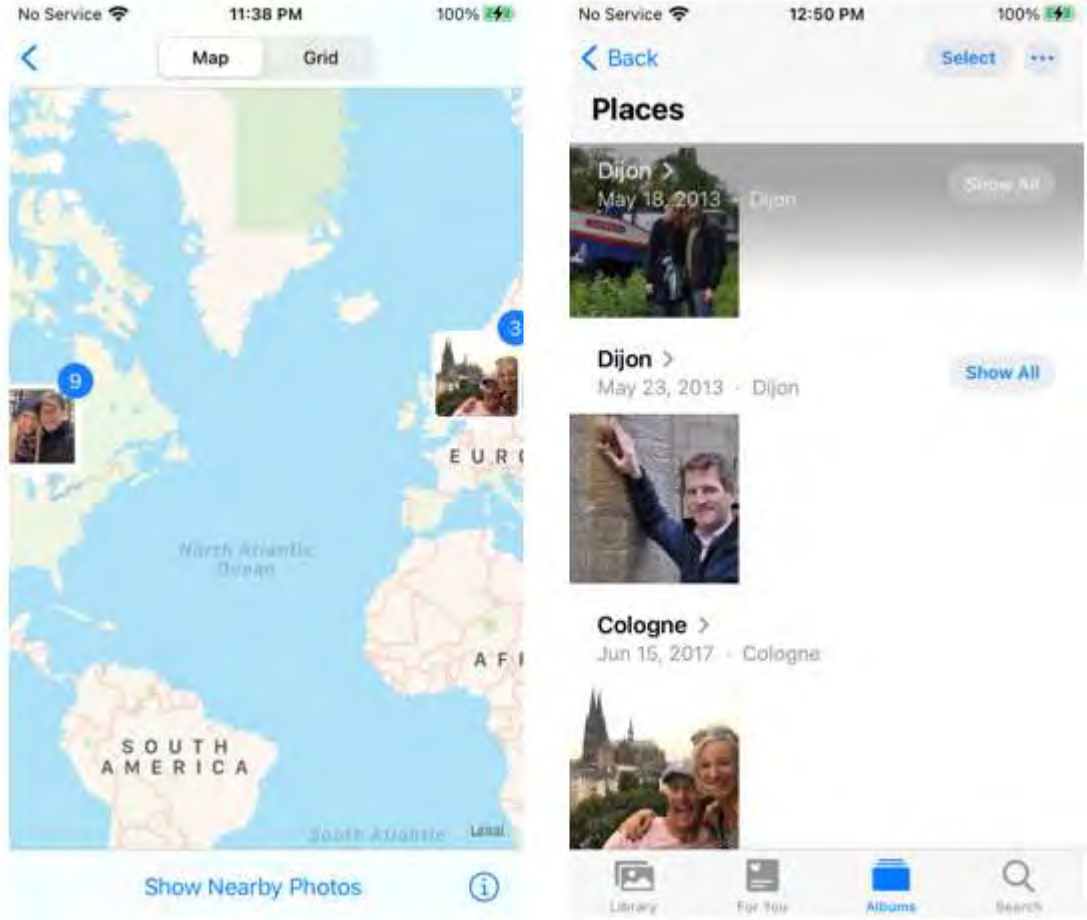


**23.** The method of claim 3, wherein each of the first

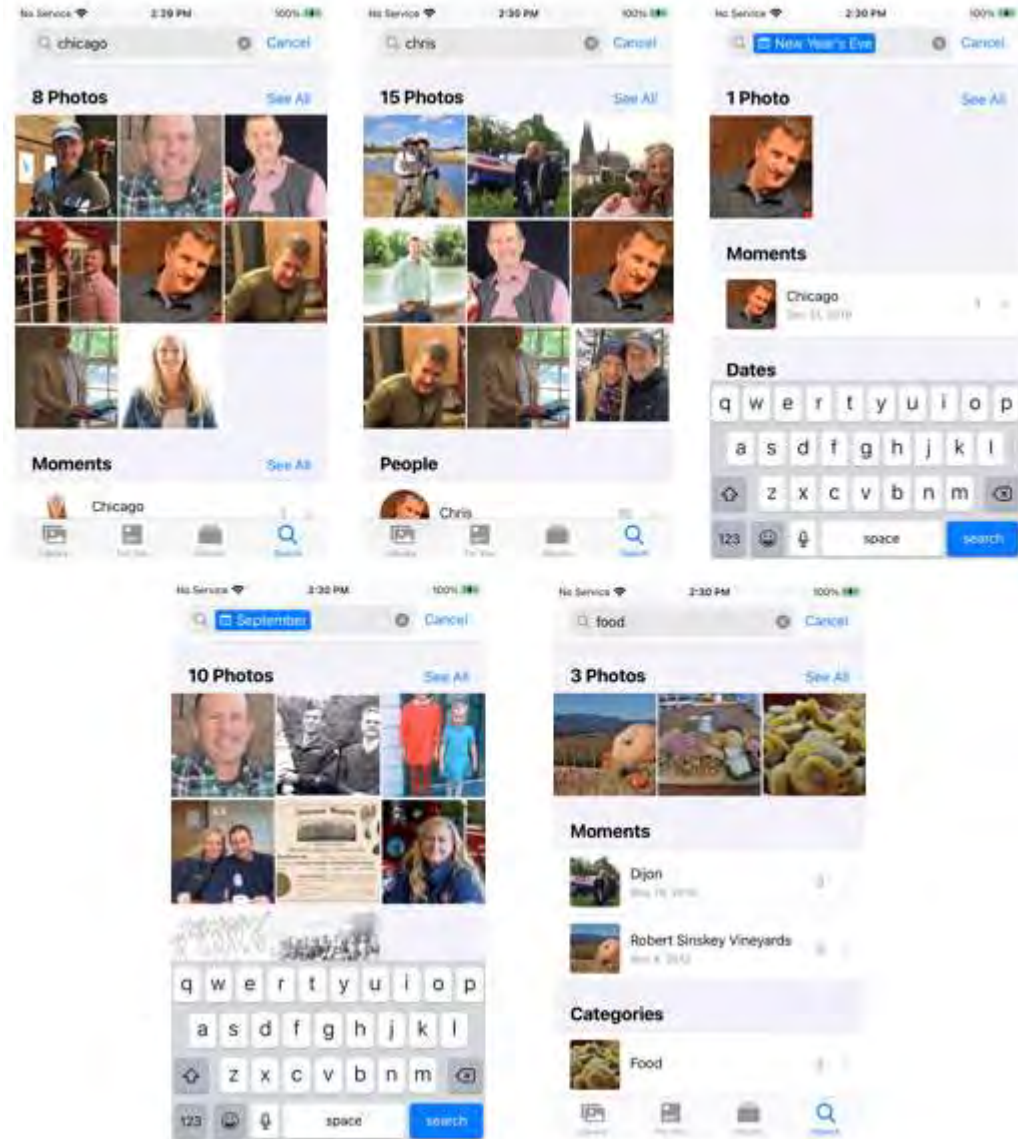
Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

<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>

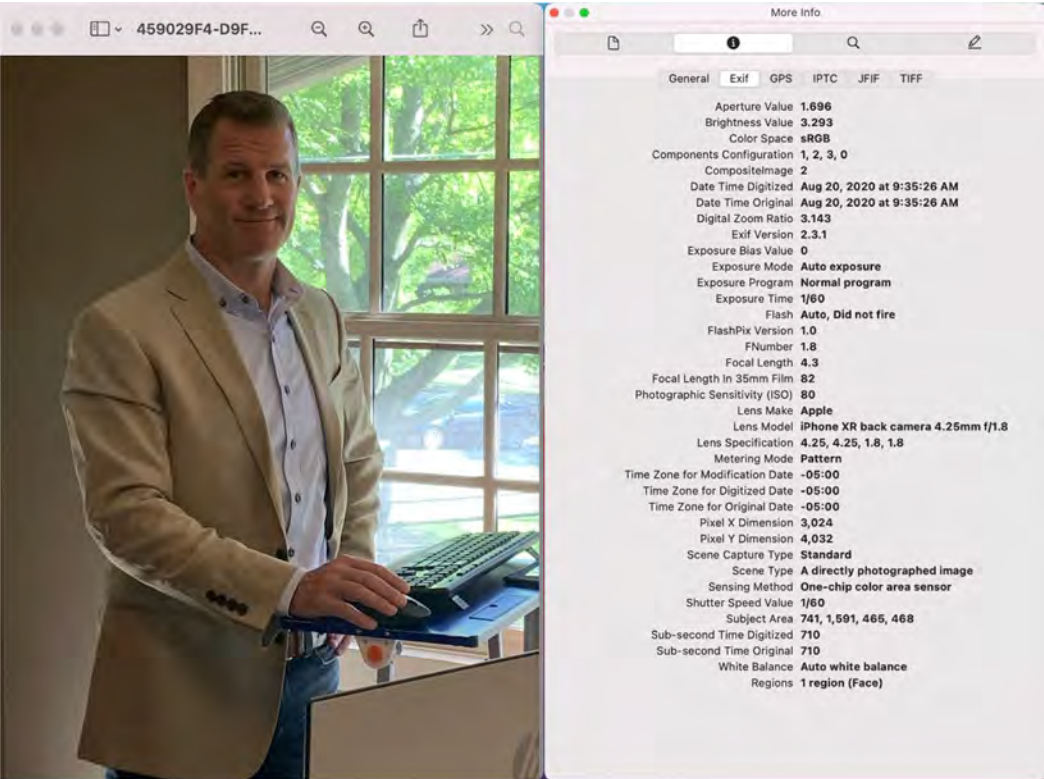
<p>of digital files displayed on the interface responsive to the selection associated with the first location is not overlaid on the interactive geographic map and</p>	
<p><b>25[b]</b> at least one digital file in the second set of digital files displayed on the interface responsive to the selection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



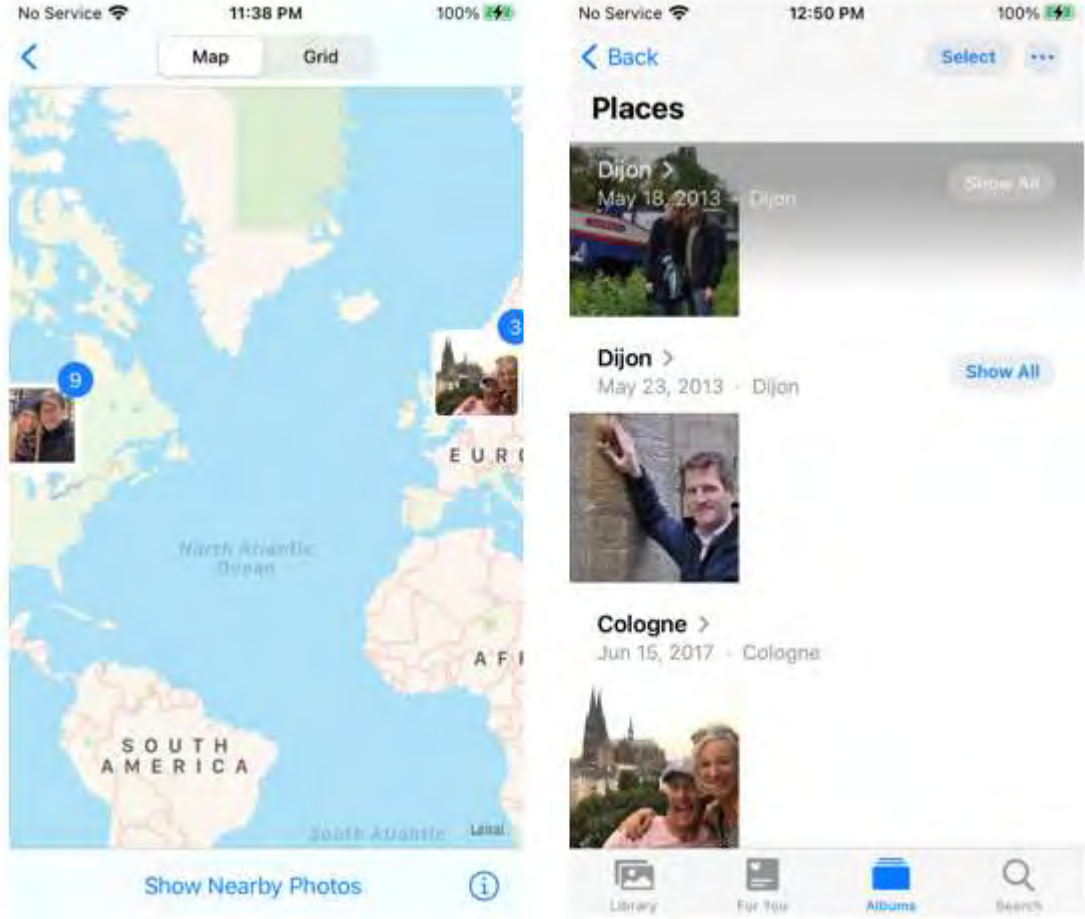


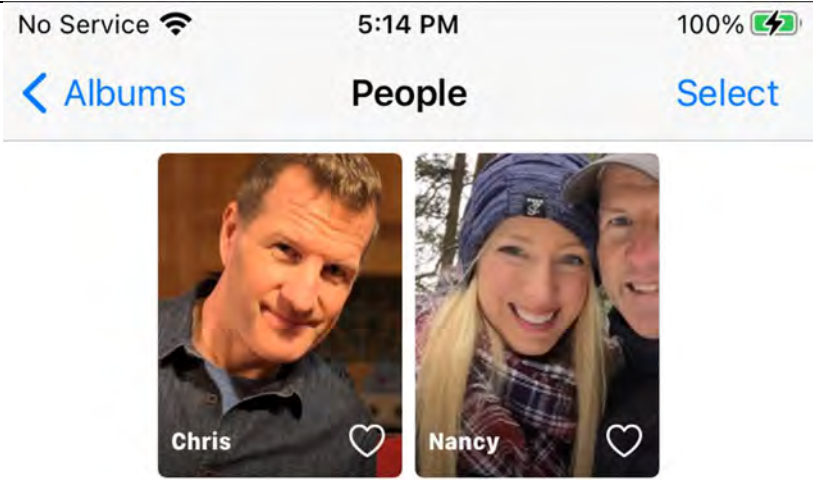
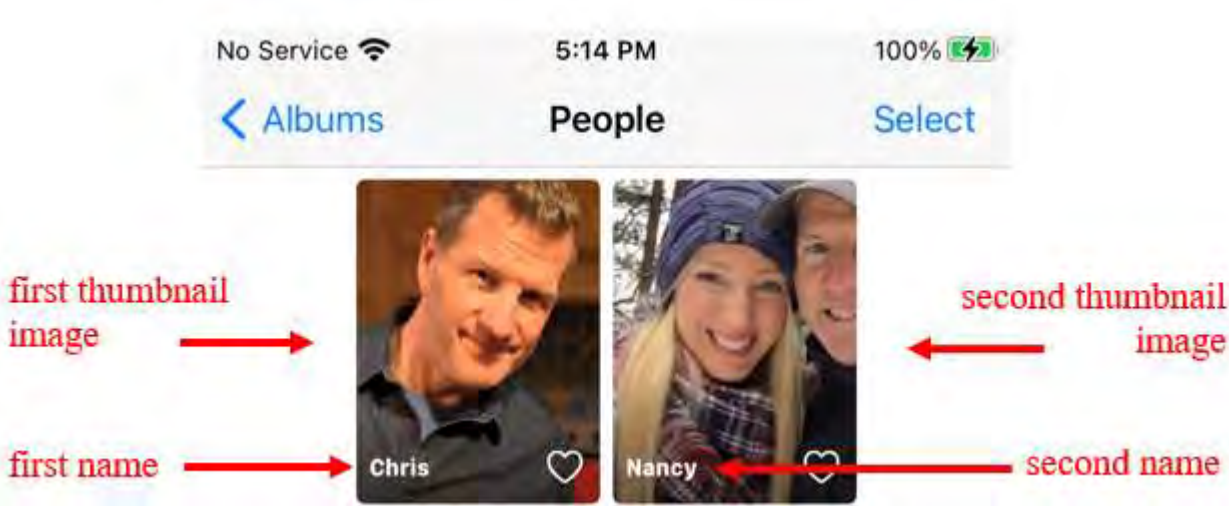
<p><b>27.</b> The method of claim 10, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.</p>	<p>Exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with 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 screenshot shows a macOS photo viewer window with a photo 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 various EXIF data fields. 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>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>

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<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 information for limitation 1[c].</i></p>
<p><b>30[pre]</b> The method of claim 25, wherein</p>	<p><i>See information for claim 25.</i></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 interface 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> 

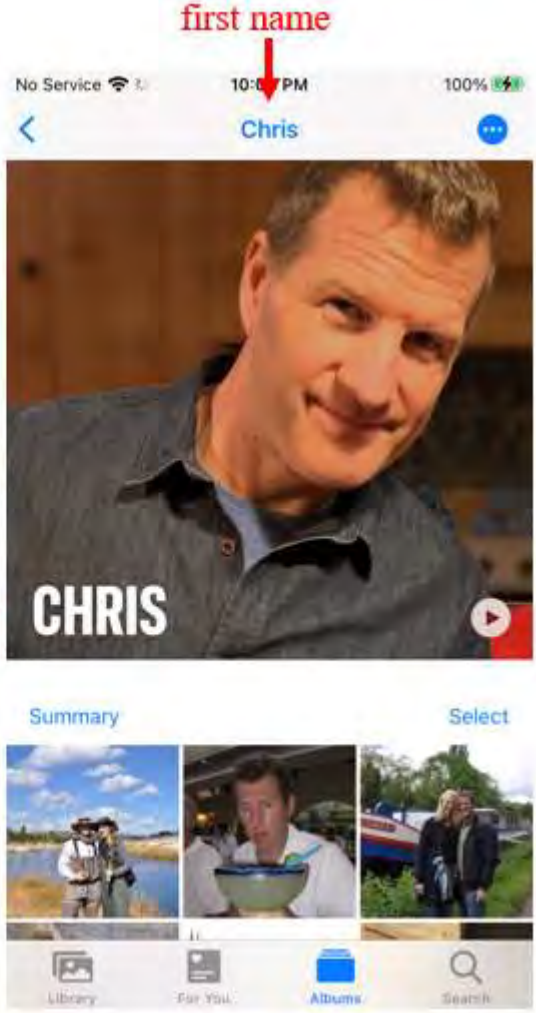
**31[b]** responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:

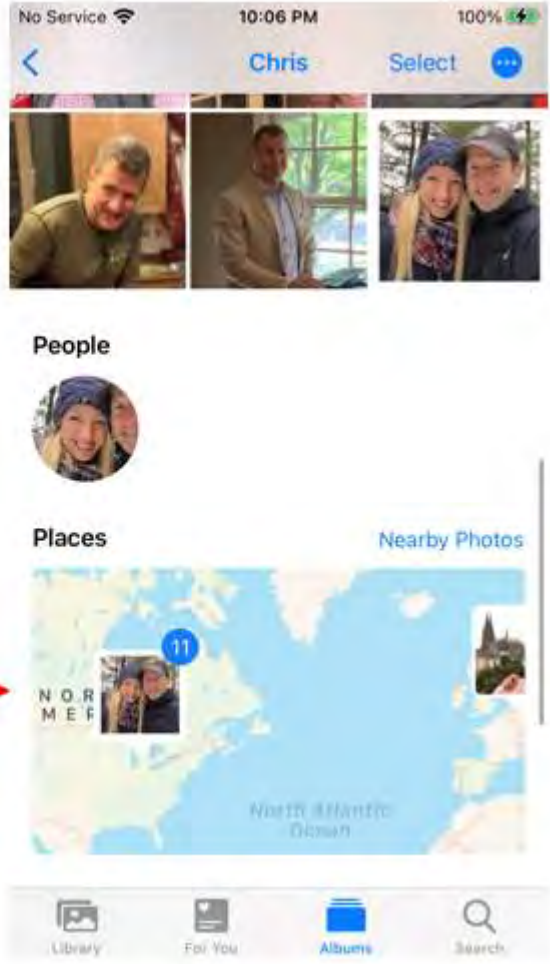
Responsive to an input that is indicative of a selection associated with the first person (e.g., tapping the first thumbnail image in the people view), iOS causes a first person view to be displayed on the interface.



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

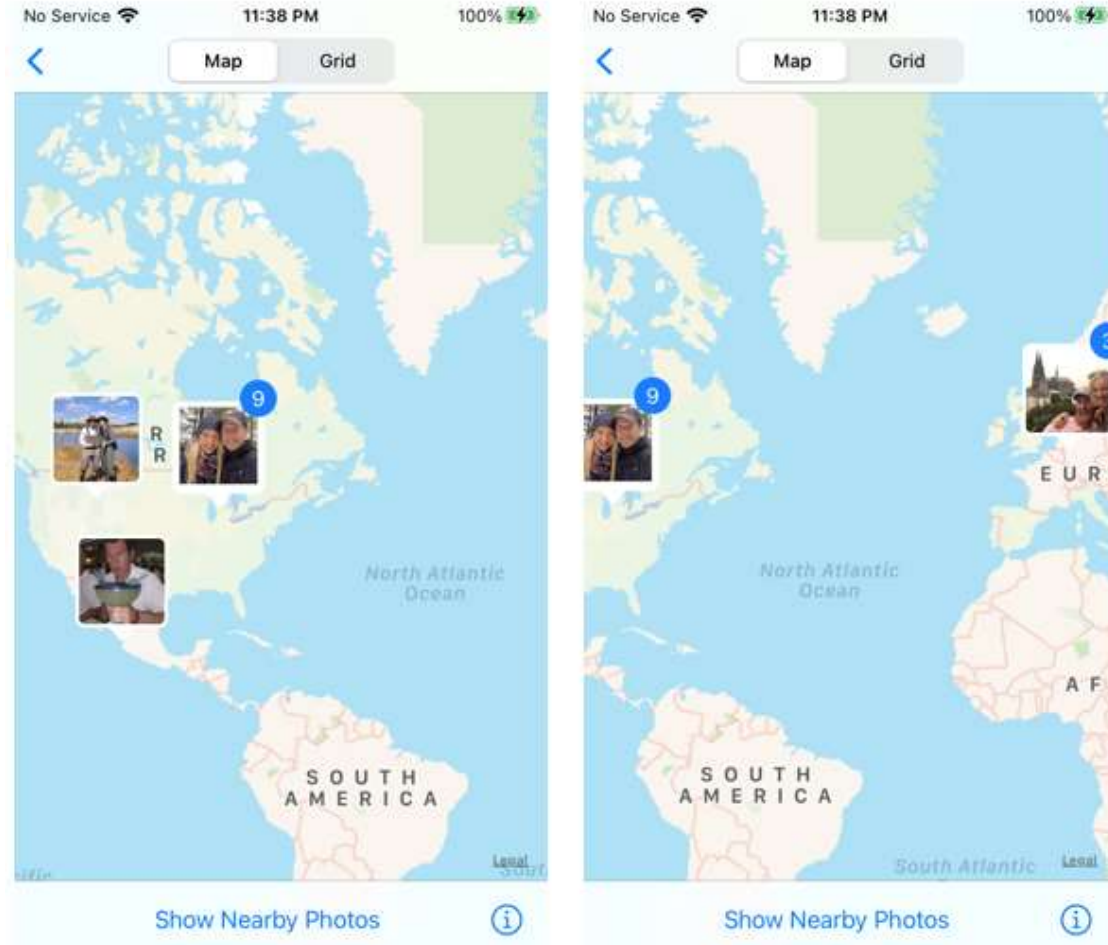
The first person view includes a first digital file associated with the first person and the first name associated with the first person.

	 <p>The screenshot shows an iPhone contact card for a person named Chris. At the top, the status bar displays 'No Service', signal strength, Wi-Fi, time '10:07 PM', and battery '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 is an iOS-style navigation bar with icons for Library, For You, Albums, and Search. Red annotations with arrows point to: 'first name' above the contact name, 'first digital file' pointing to the portrait photo, and 'first name' pointing to the name 'CHRIS' on the photo.</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 content 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 small 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>

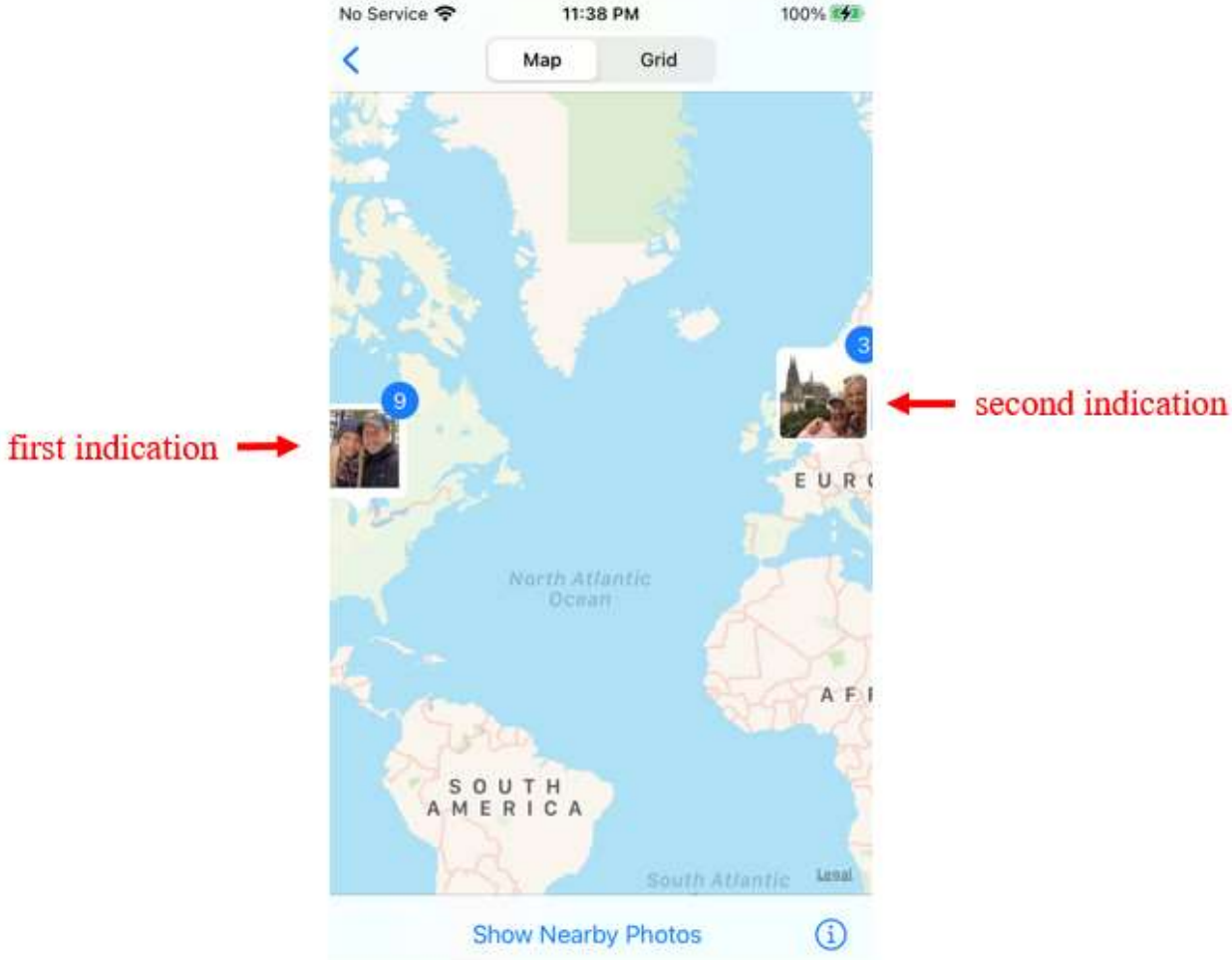


view, causing a first location view to be displayed on the interface, the first location view including:



**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.

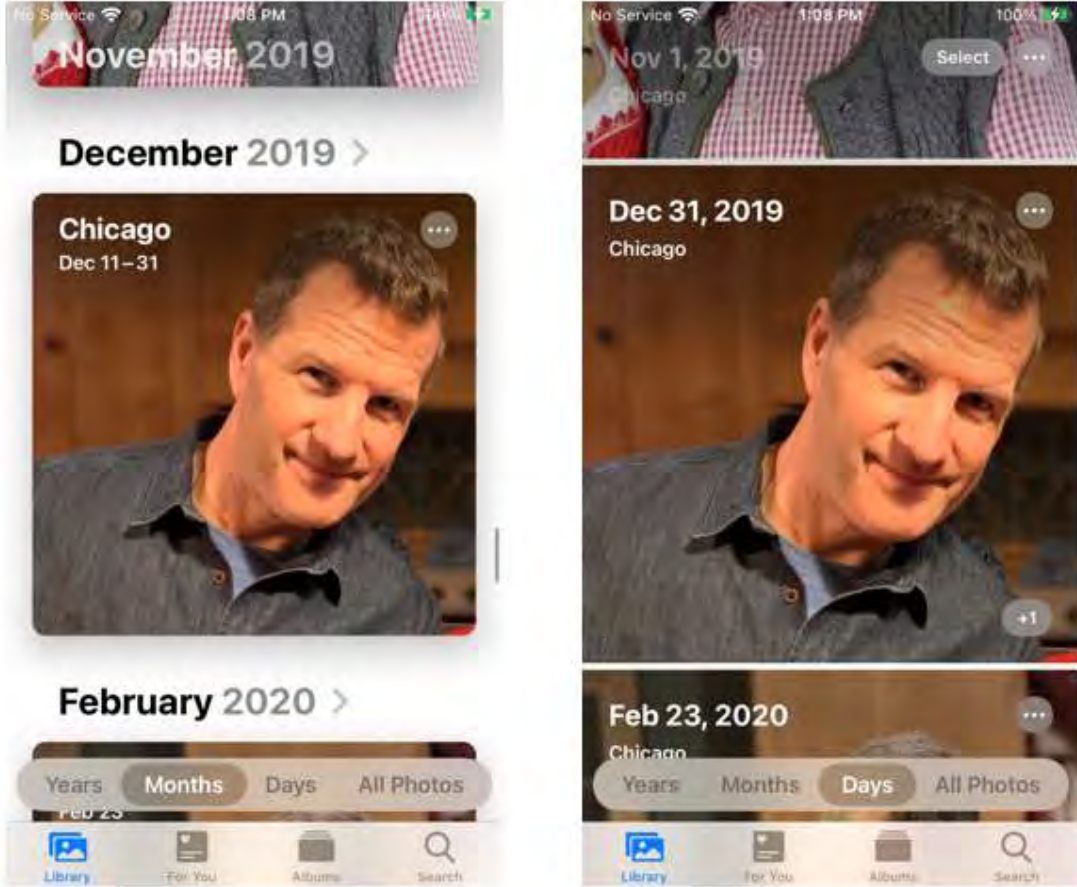
displayed on the interface; and



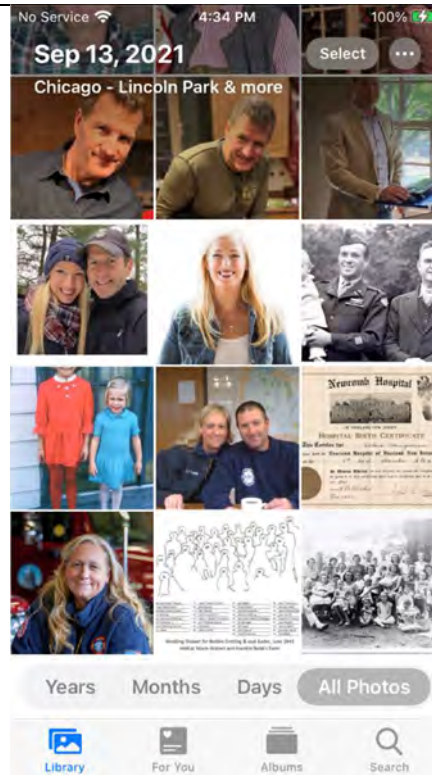
**31[f]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be

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>

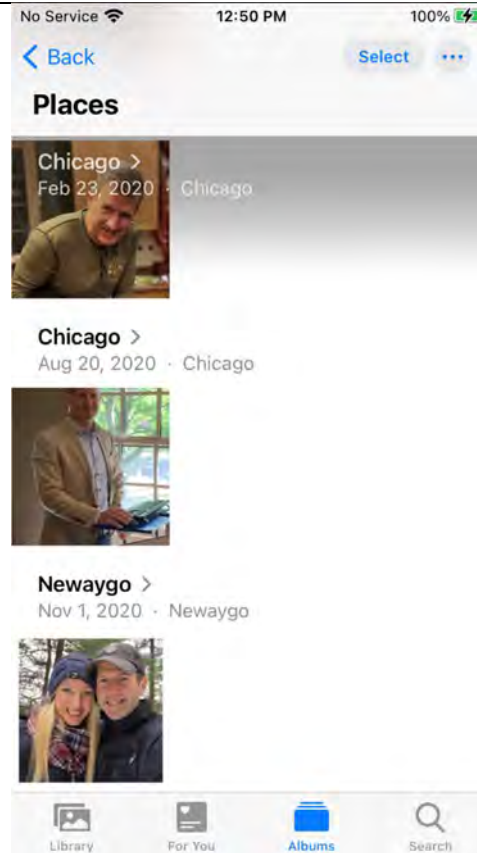
to receiving the year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.



**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

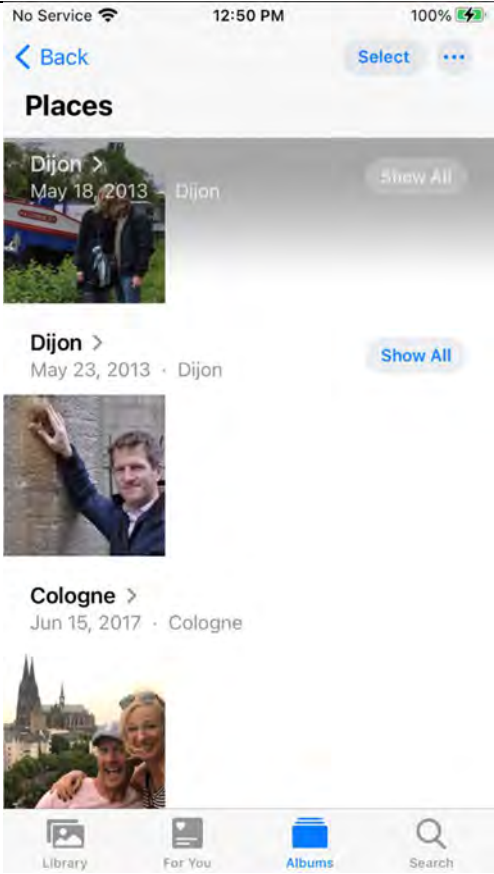
The first indication is associated with a first set of digital files and the first location. For example, iOS causes the view below to be displayed responsive to a selection of the first indication.

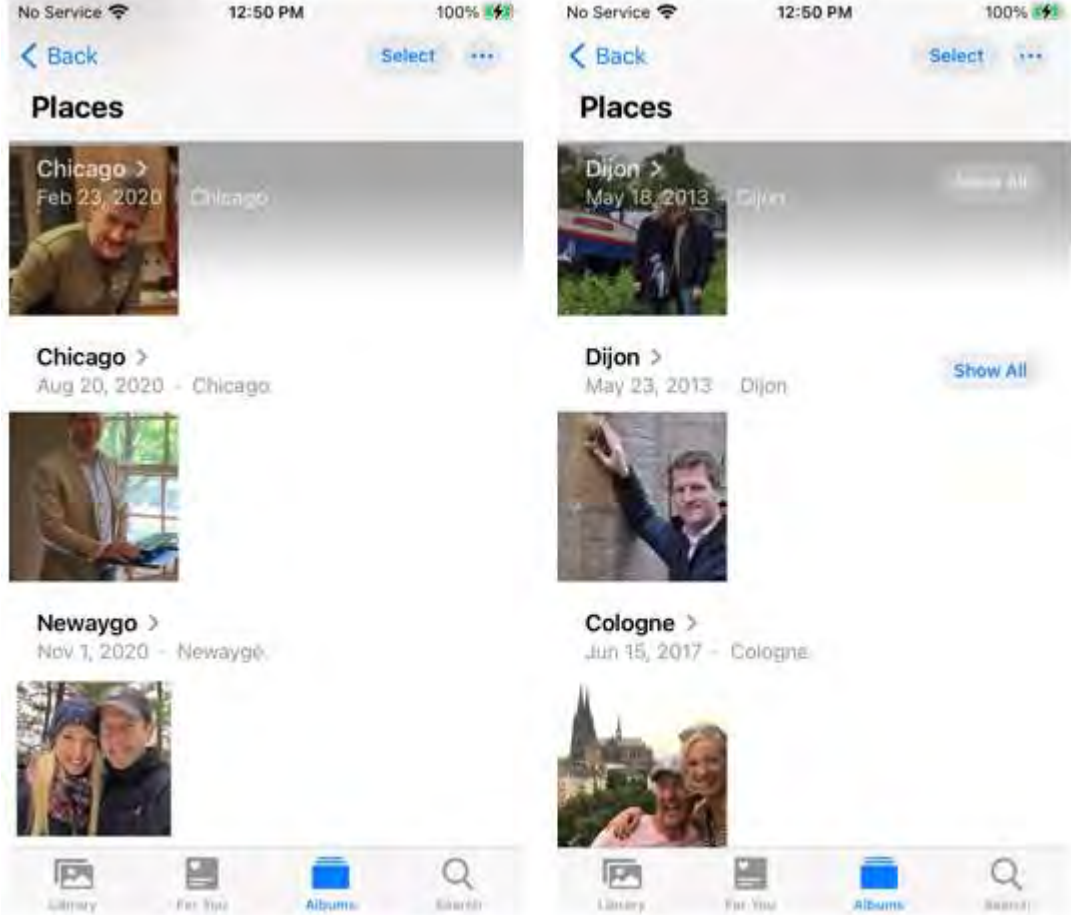
digital files and the second location.

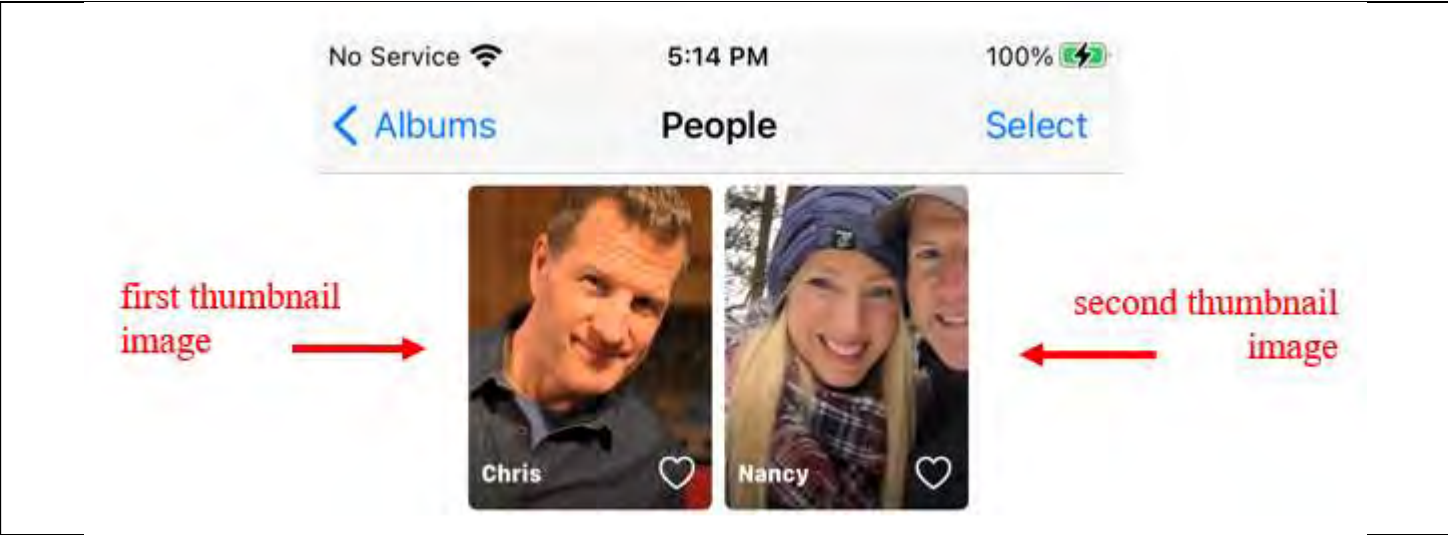


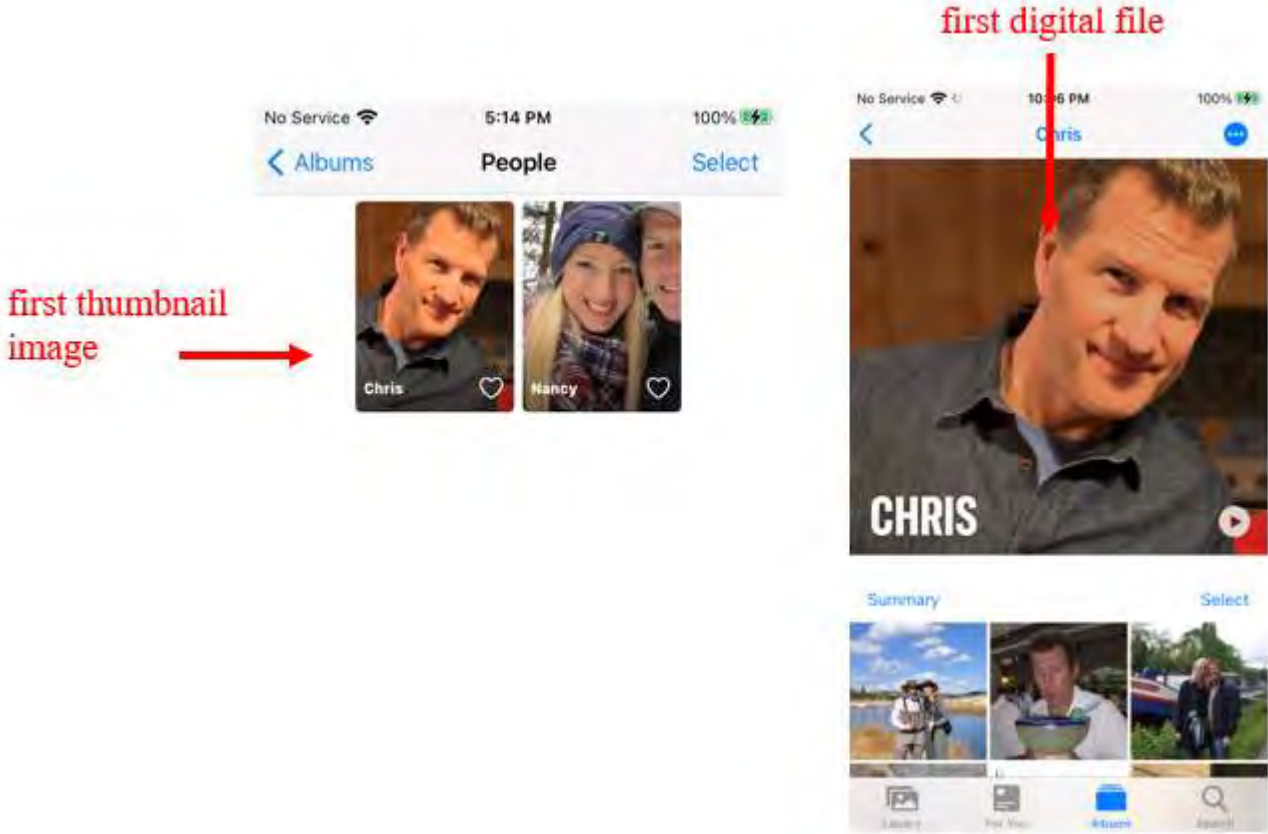
The second indication is associated with a second set of digital files and the second location. For example, iOS causes the view below to be displayed responsive to a touch/tap of the second indication.



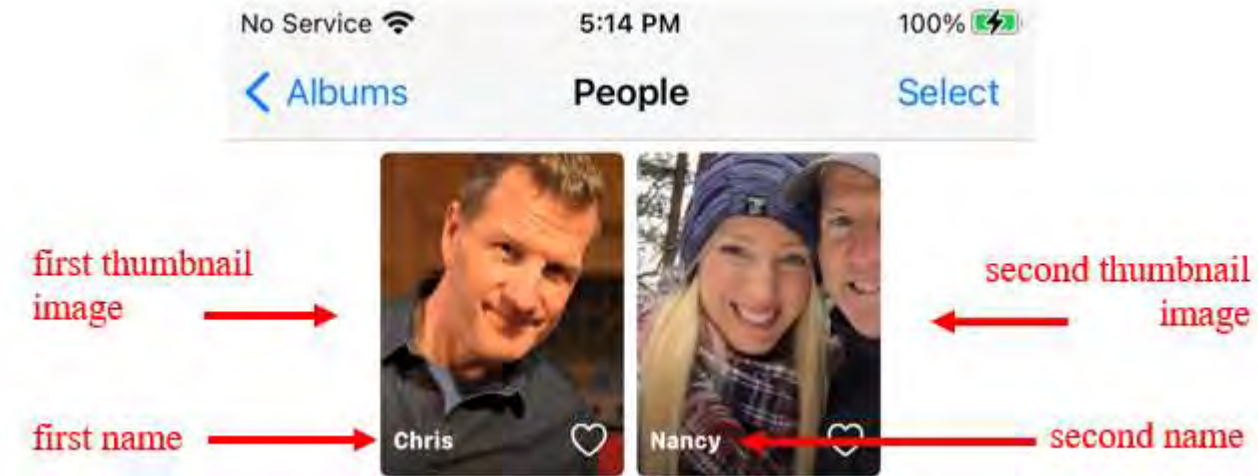
	 <p>The screenshot shows the 'Places' section of the Photos app. At the top, it says 'No Service', '12:50 PM', and '100%' battery. Below the 'Places' header, there are three entries: 'Dijon &gt;' with a date of 'May 18, 2013' and a 'Show All' button; 'Dijon &gt;' with a date of 'May 23, 2013' and a 'Show 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'. The main content area shows two person thumbnails. The first thumbnail is a portrait of a man labeled 'Chris' with a heart icon below it. The second thumbnail is a portrait 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>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 large photo of Chris.</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.

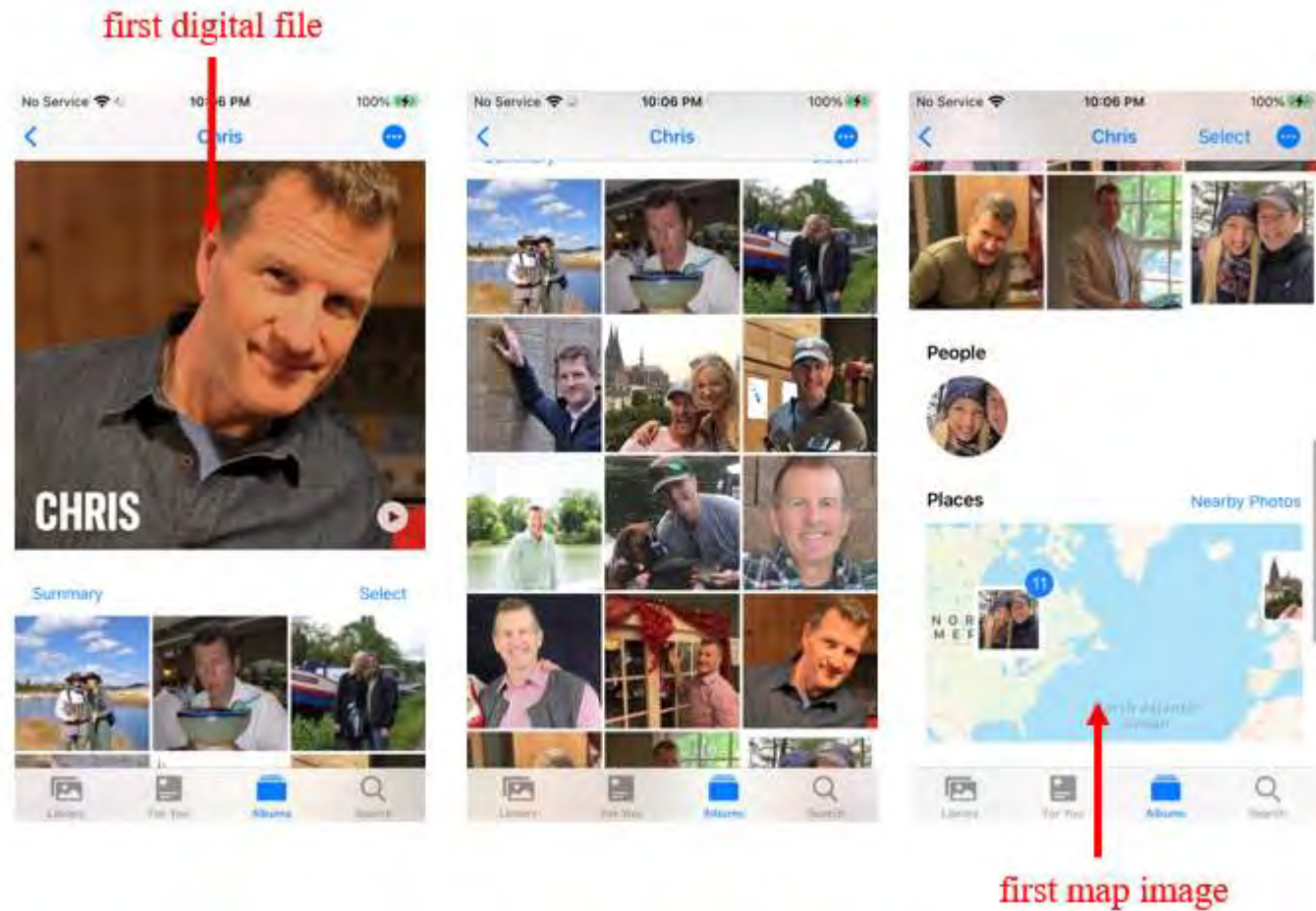


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

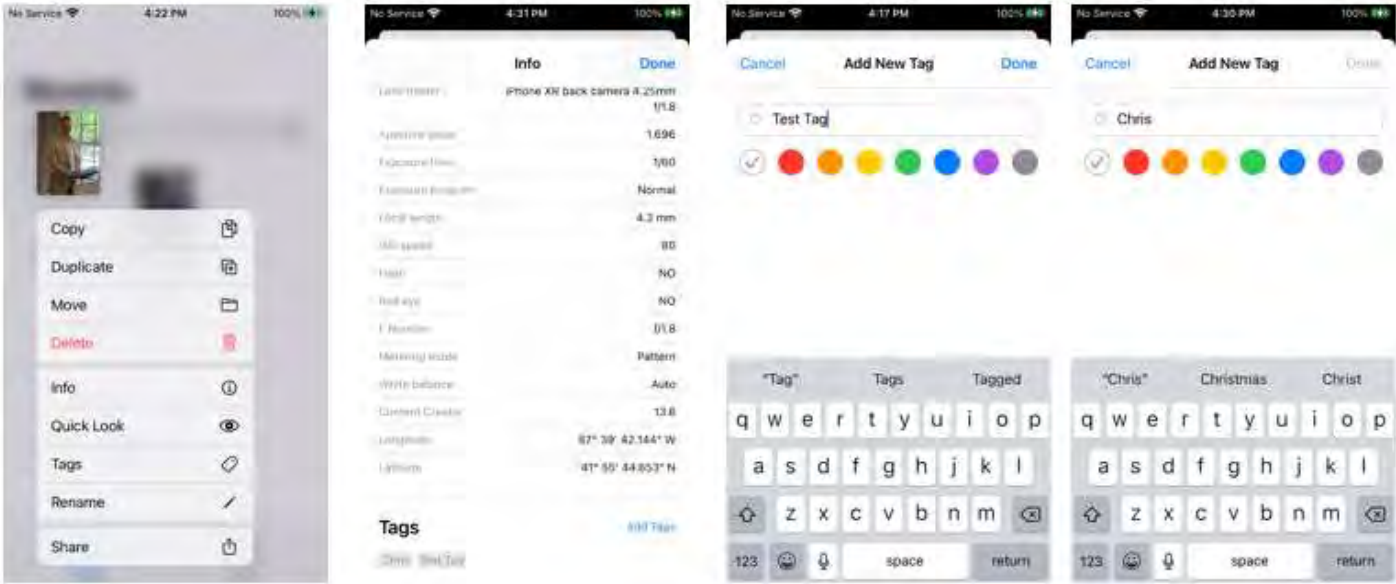


**40[pre]** The method of claim 31, further comprising,

See information for claim 1.

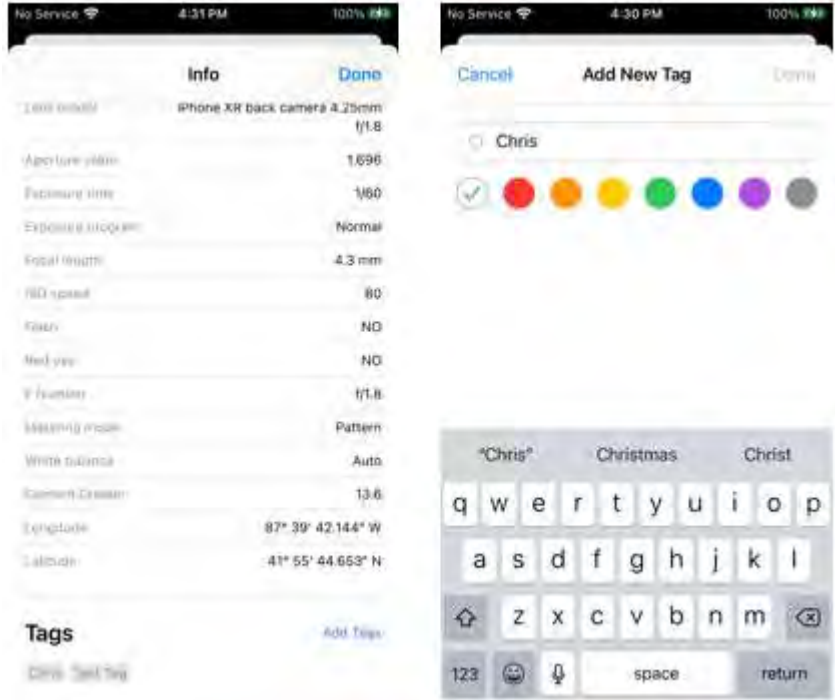
<p><b>40[a]</b> prior to the causing the interface to display the people view: causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iOS causes the first digital file to be displayed on the interface.</p> 
<p><b>40[b]</b> 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>

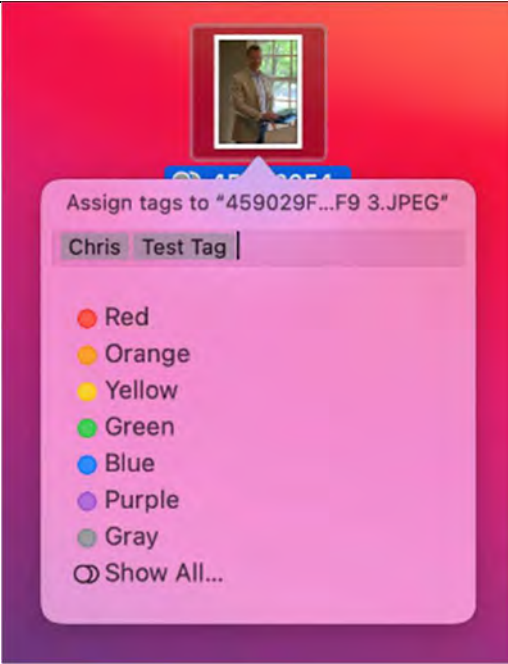
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

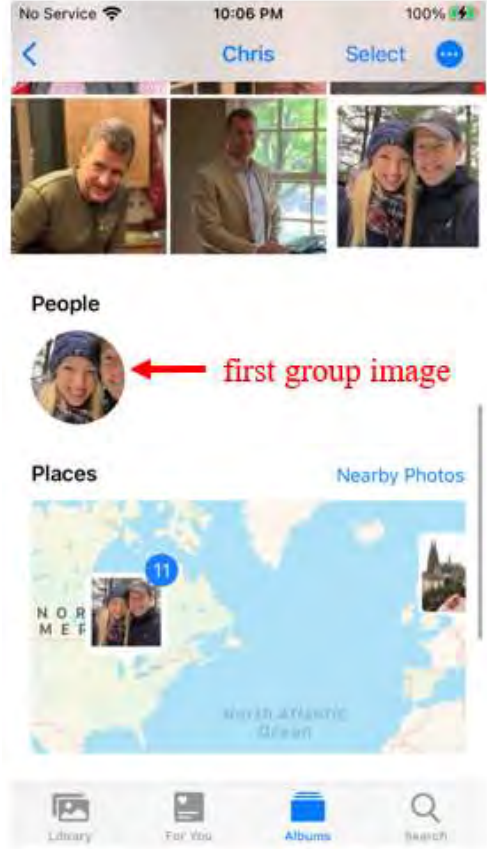
	 <p>As a second example, iOS receives alphanumeric text as a first user-generated tag via the Photos application when Photos initially recognizes faces in photographs/videos.</p>
<p>40[c] associating the first digital file with the first user-generated tag.</p>	<p>iOS associates the first digital file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

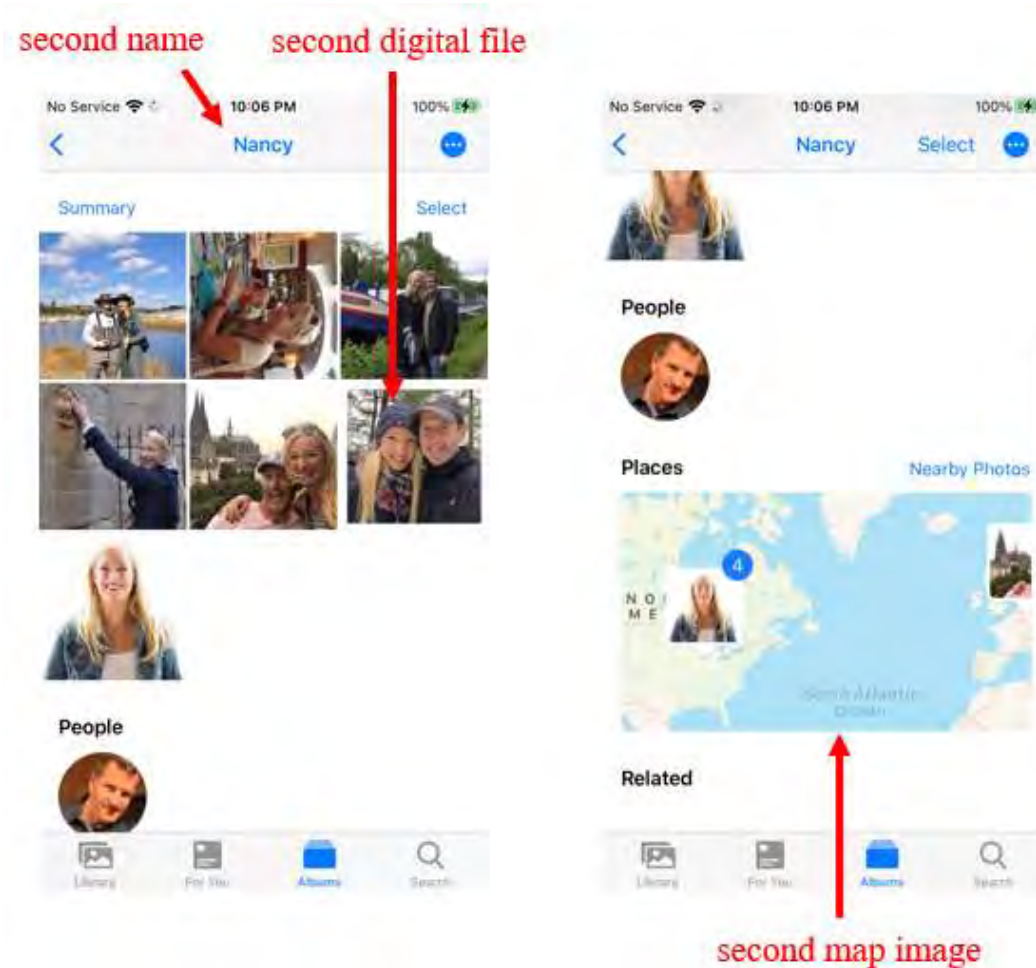
<p>associated with the first user-generated tag.</p>	
<p><b>43[pre]</b> The method of claim 31, wherein</p>	<p>See information for claim 31.</p>
<p><b>43[a]</b> the first person view includes a first group image and</p>	<p>The first person view includes a first group image.</p>

	 <p>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. At the bottom is a navigation bar with icons for Library, For You, Albums, and Search.</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>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>

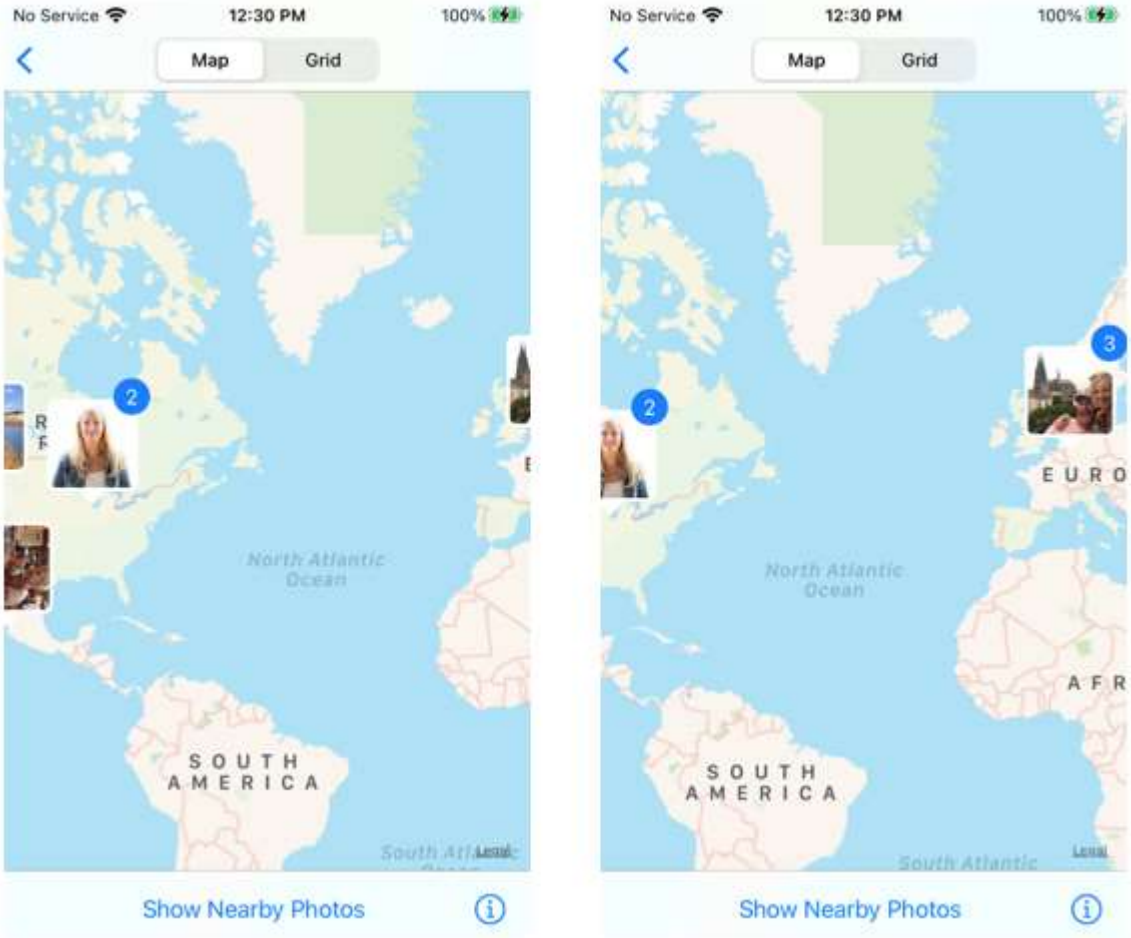
**45.** The method of claim 35, further comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the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

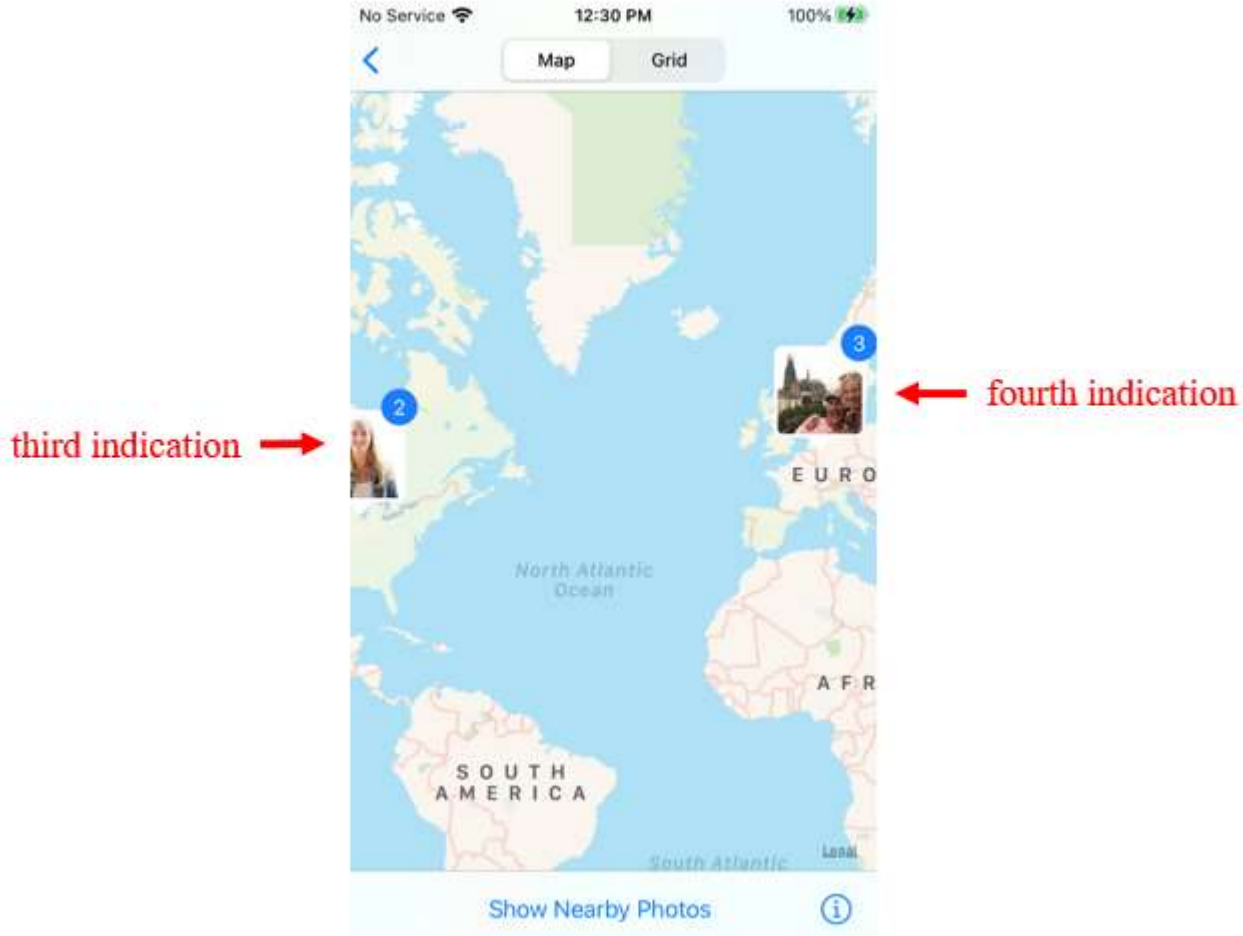


Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

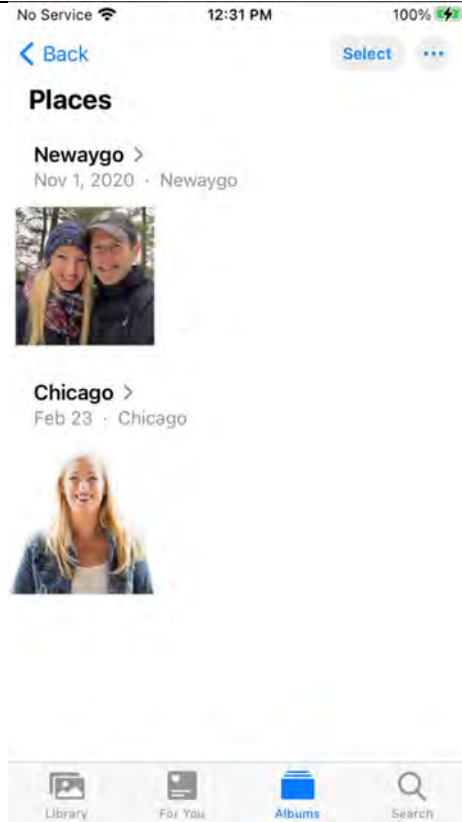
<p><b>46[pre]</b> The method of claim 45, further comprising:</p>	<p><i>See information for claim 45.</i></p>
<p><b>46[a]</b> responsive to an input that is indicative of a selection of the second map image, causing a second location view to be displayed on the interface, <b>46[b]</b> the second location 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 shows two side-by-side screenshots of an iPhone map application. Both screenshots display a world map centered on the North Atlantic Ocean. The top status bar shows 'No Service', '12:30 PM', and '100%' battery. Below the status bar are 'Map' and 'Grid' buttons. The map shows several photo thumbnails with numbered blue circles: '2' is positioned over North America, and '3' is positioned over Europe. At the bottom of each screenshot 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>

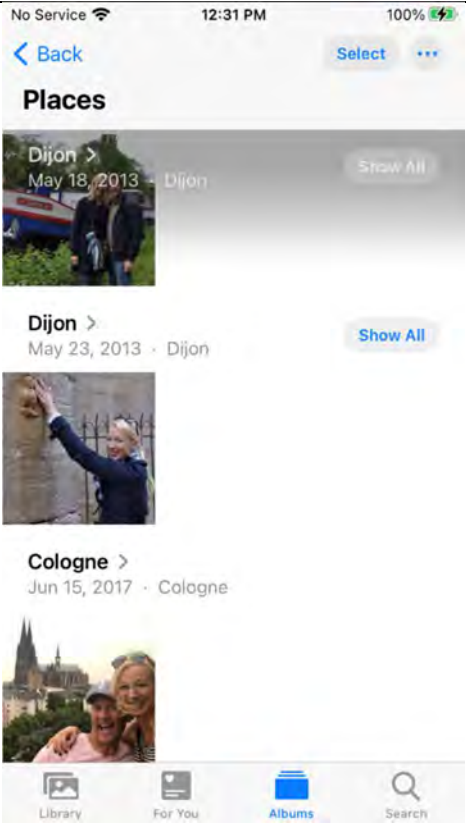


<p>geographic map, and <b>46[d]</b> a fourth indication positioned at a fourth location on the interactive geographic map.</p>	 <p>The screenshot shows an iOS map application interface. At the top, the status bar displays 'No Service', '12:30 PM', and '100%' battery. Below the status bar are navigation 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', 'EURO', and 'AFR'. 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.

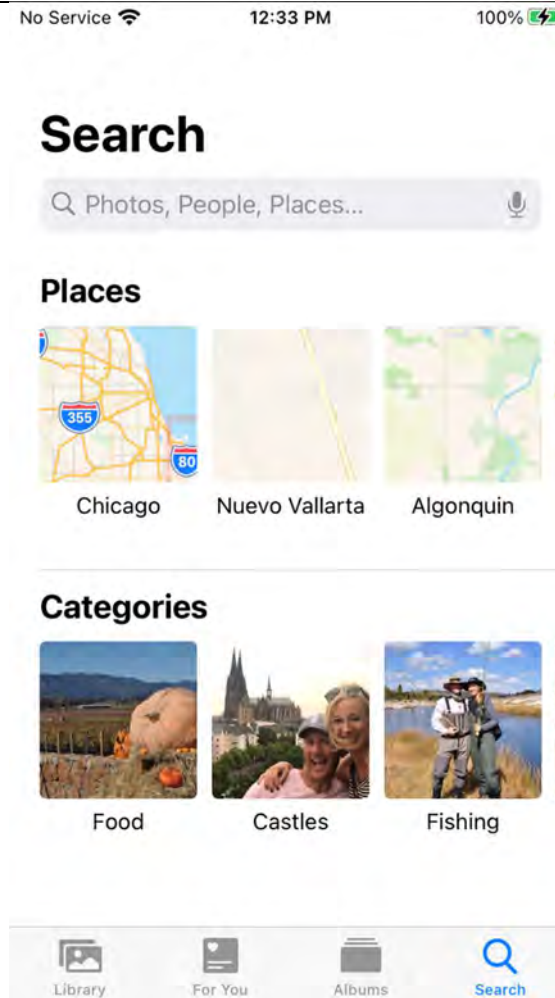


The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iOS displays the view below responsive to tapping the fourth indication.

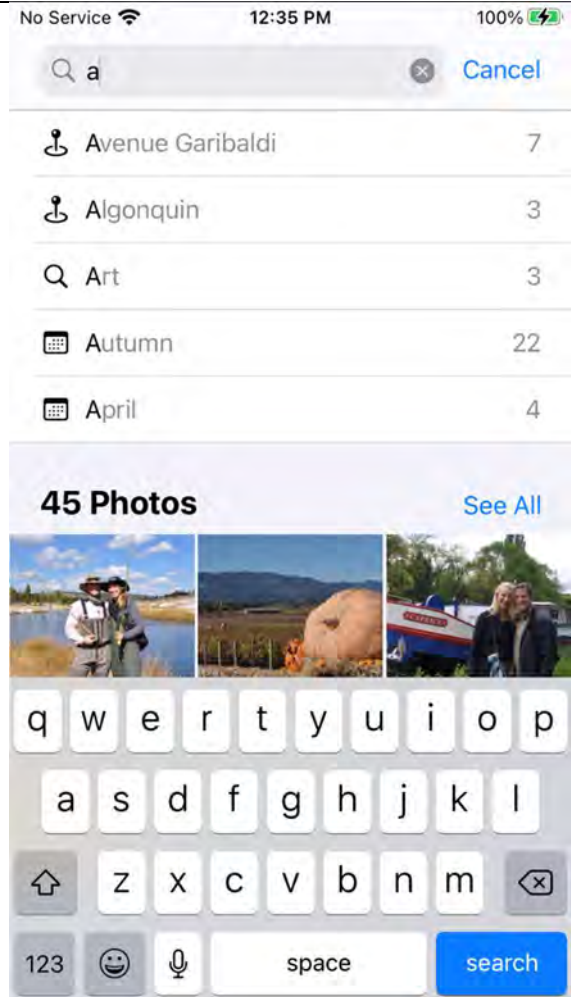
	 <p>The screenshot shows the Photos app interface on an iPhone. At the top, it displays 'No Service', '12:31 PM', and '100%' battery. Below the status bar, there are navigation options: '&lt; Back', 'Select', and a three-dot menu. The main content is titled 'Places' and lists three photo albums: 'Dijon &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>

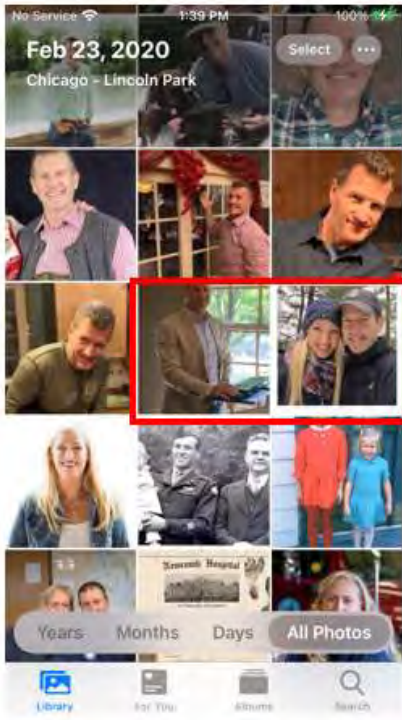
the interface based at least in part on the one or more filtering criteria.



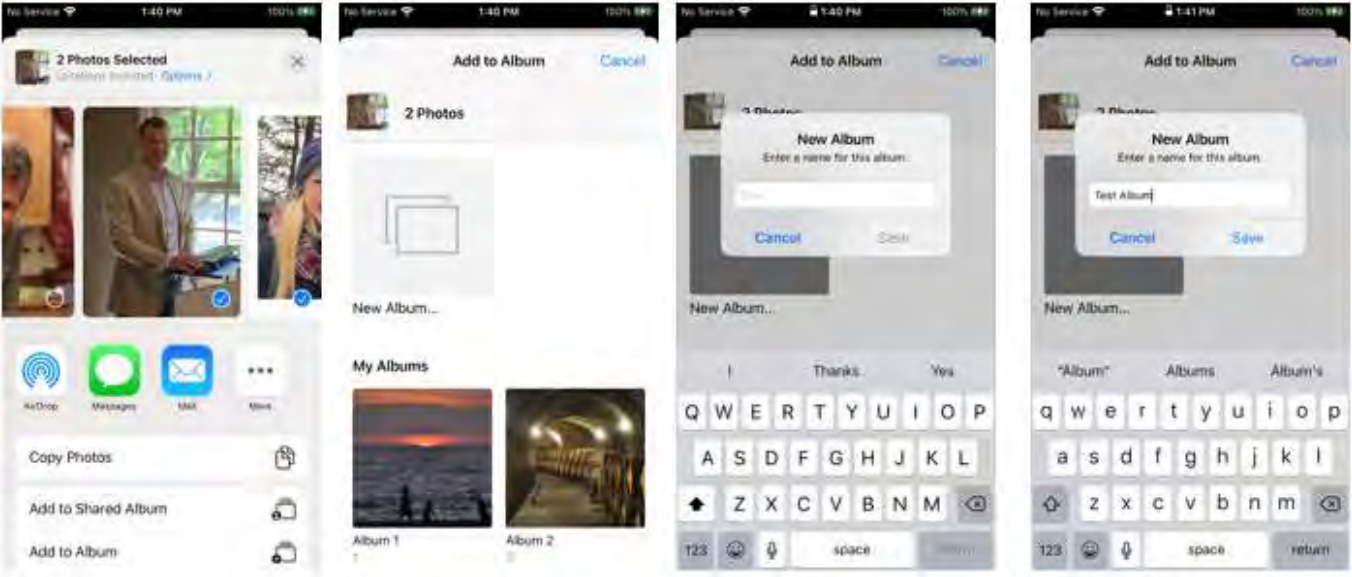
Further, iOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing just the letter “a” as a filtering criterion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



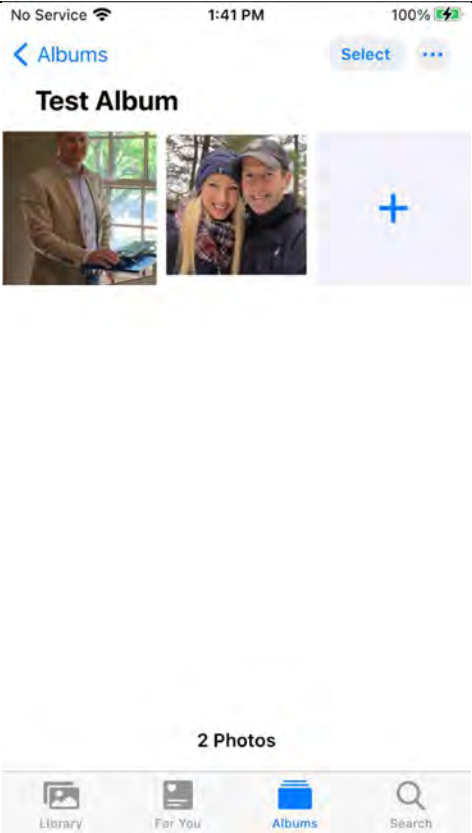
The filtering criteria discussed above are exemplary and it should be understood that iOS may receive many different filtering criteria.

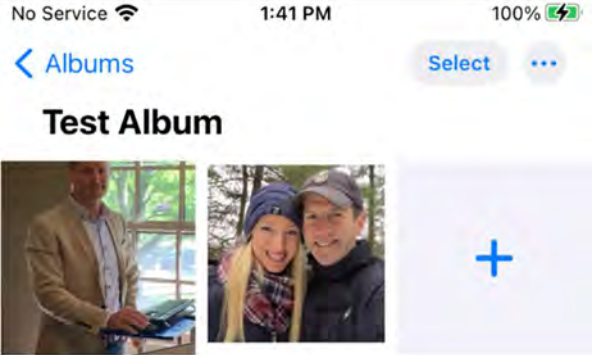
<p><b>50[pre]</b> The method of claim 49, further comprising:</p>	<p>See information for claim 49.</p>
<p><b>50[a]</b> causing a second plurality of images to be displayed on the interface;</p>	<p>iOS causes a plurality of images to be displayed on the interface.</p>  <p>The screenshot shows an iOS photo 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>

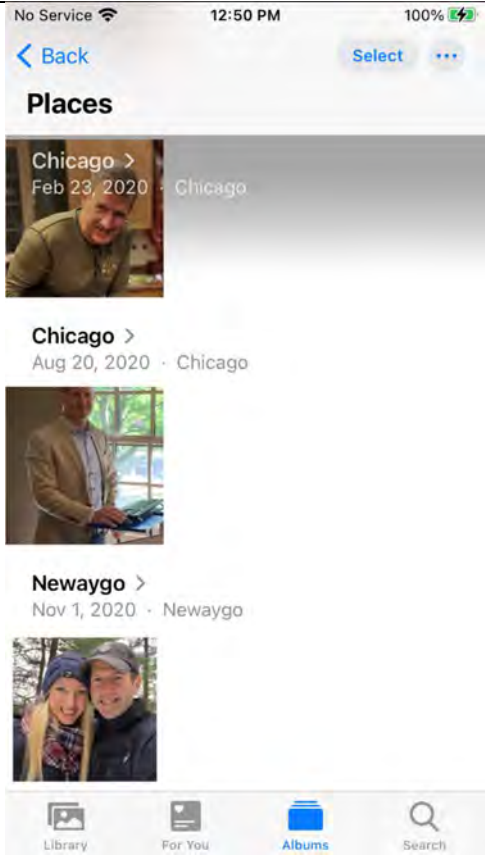
Initial Infringement Contentions – U.S. Patent No. 11,017,020 – Apple iOS

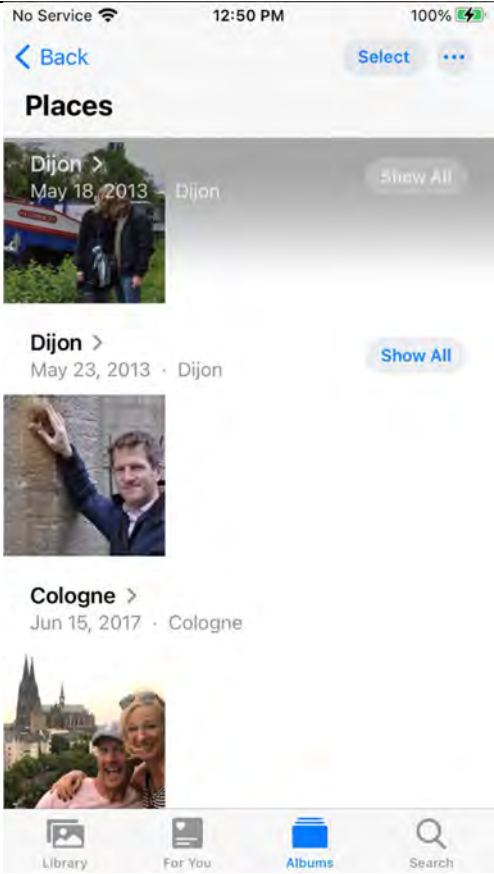
	 <p>The figure consists of four sequential screenshots of the iOS Photos app. The first screenshot shows two photos selected, with a '2 Photos Selected' header and a 'New Album...' button. The second screenshot shows the 'Add to Album' dialog with a 'New Album...' button. The third screenshot shows the 'New Album' dialog with a text input field containing 'Test Album' and a 'Save' button. The fourth screenshot shows the 'New Album' dialog with a keyboard displayed, showing the text 'Test Album' being typed.</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>

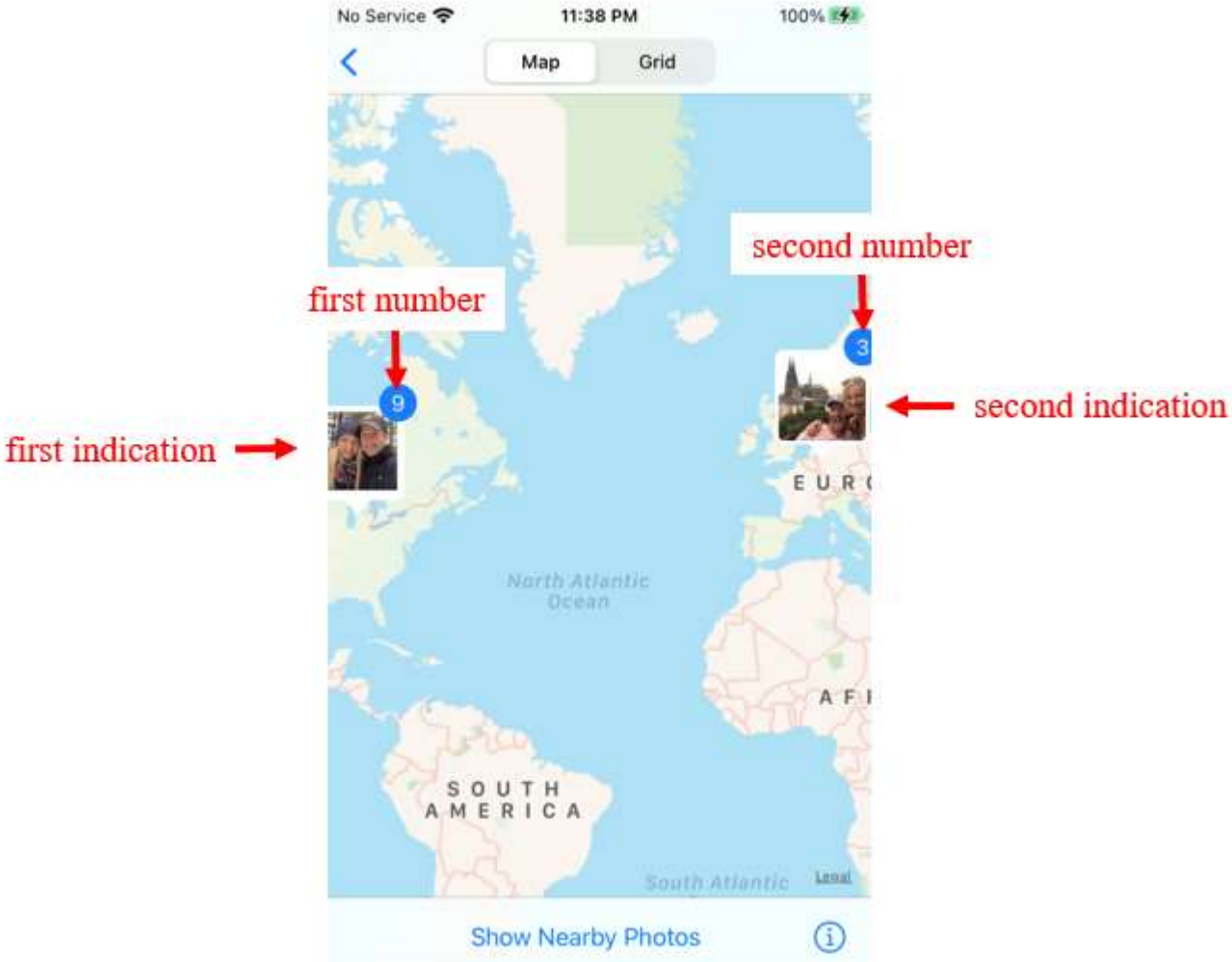


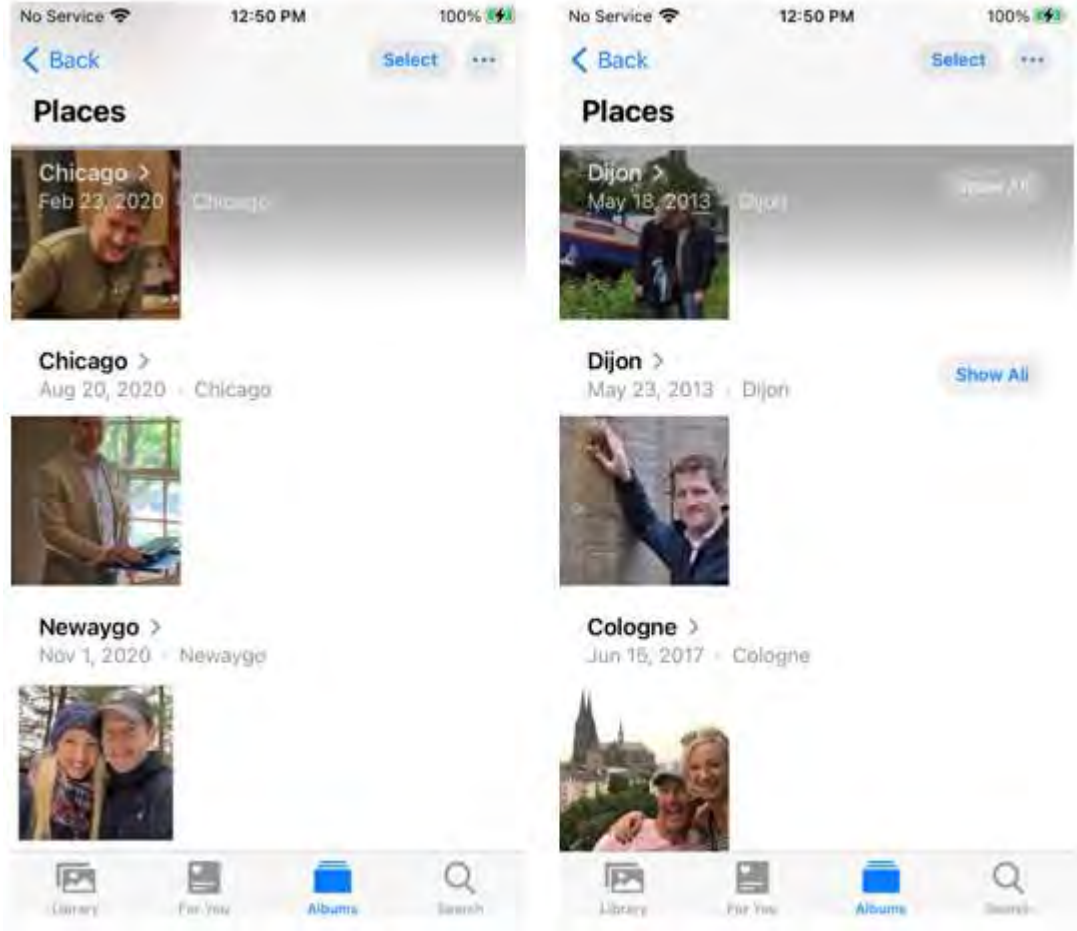
	 <p>The screenshot shows the 'Test Album' view in the Photos app. At the top, the status bar displays 'No Service', '1:41 PM', and '100%' battery. Below the status bar, there is a back arrow labeled 'Albums', a 'Select' button, and a three-dot menu icon. The album title 'Test Album' is centered. Below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

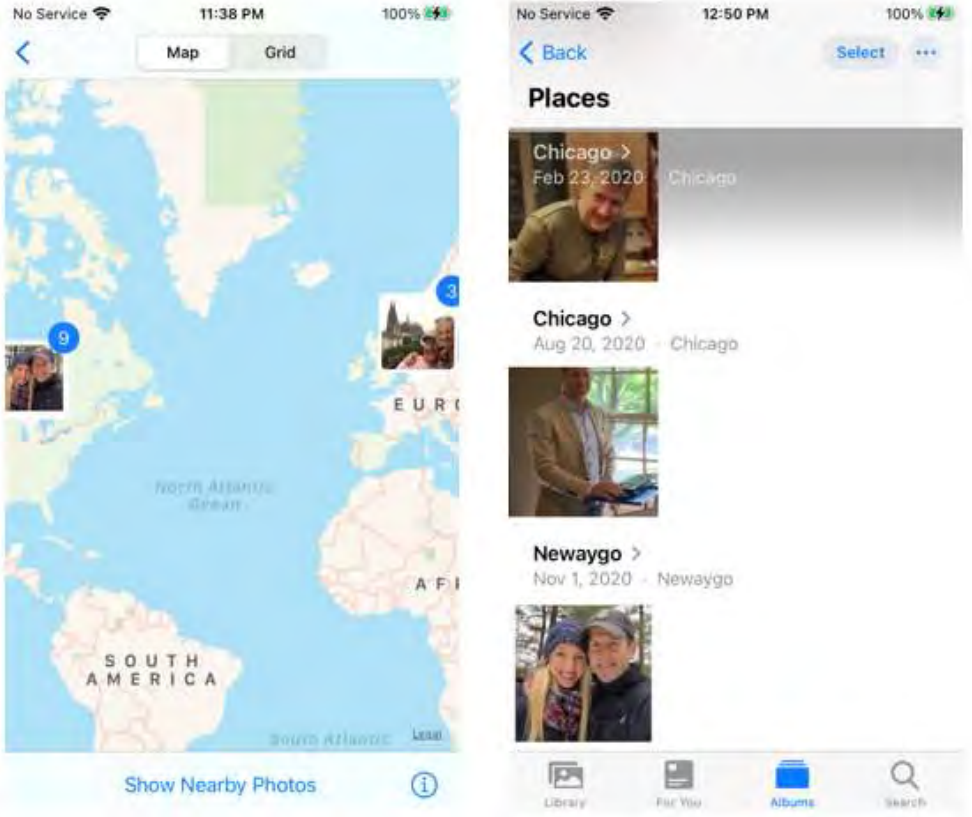
	 <p>The screenshot shows the 'Test Album' in the Photos app. At the top, the status bar displays 'No Service', '1:41 PM', and '100%' battery. Below the status bar, there is a back arrow labeled 'Albums', a 'Select' button, and a three-dot menu icon. The album title 'Test Album' is centered. Below the title, 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>

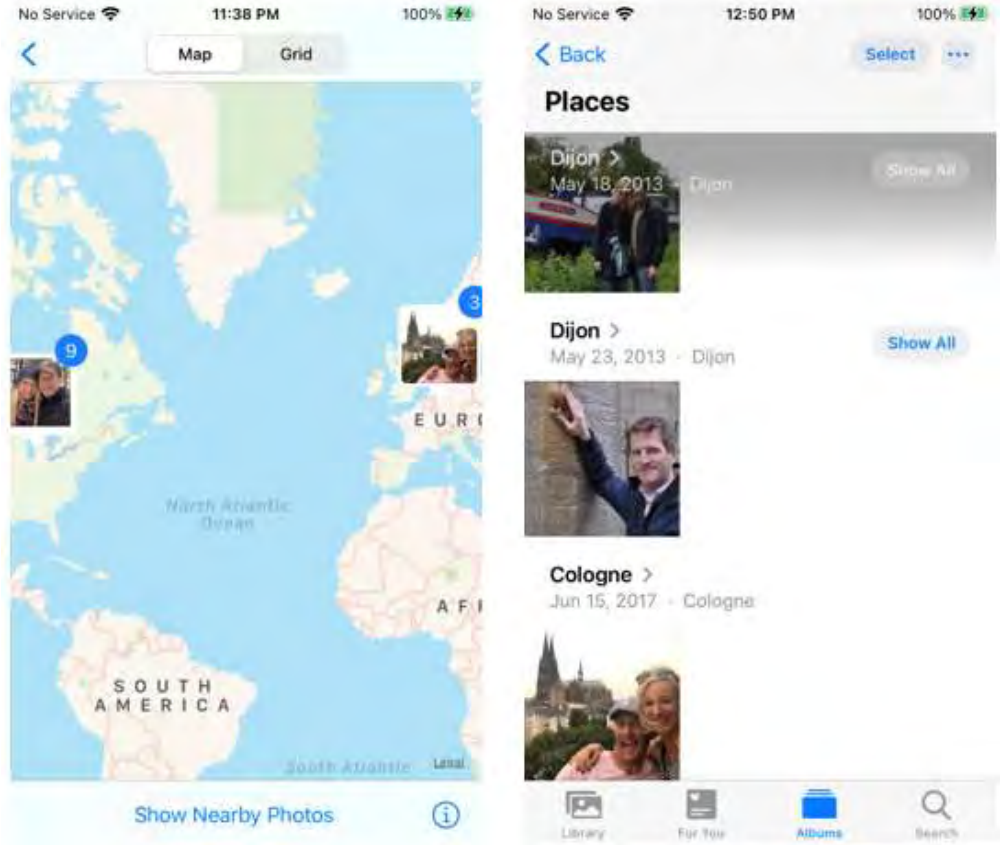
	
<p><b>51[b]</b> responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.</p>	<p>Responsive to a selection associated with the second location (e.g., responsive to a touch/tap of the second indication in the first location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

<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.</p>	 <p>The screenshot shows an iPhone map interface with a grid overlay. Two photo thumbnails are visible: one on the left and one on the right. Each thumbnail has a blue circular indicator with a white number inside. The left indicator contains the number '9' and is pointed to by a red arrow labeled 'first indication'. The right indicator contains the number '3' and is pointed to by a red arrow labeled 'second indication'. Above the '9' indicator is a white box with the text 'first number' and a red arrow pointing to the indicator. Above the '3' indicator is a white box with the text 'second number' and a red arrow pointing to the indicator. At the bottom of the map, there is a button labeled 'Show Nearby Photos' and an information icon (i).</p>
<p><b>53.</b> The method of claim 33, wherein each of the first</p>	<p>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>

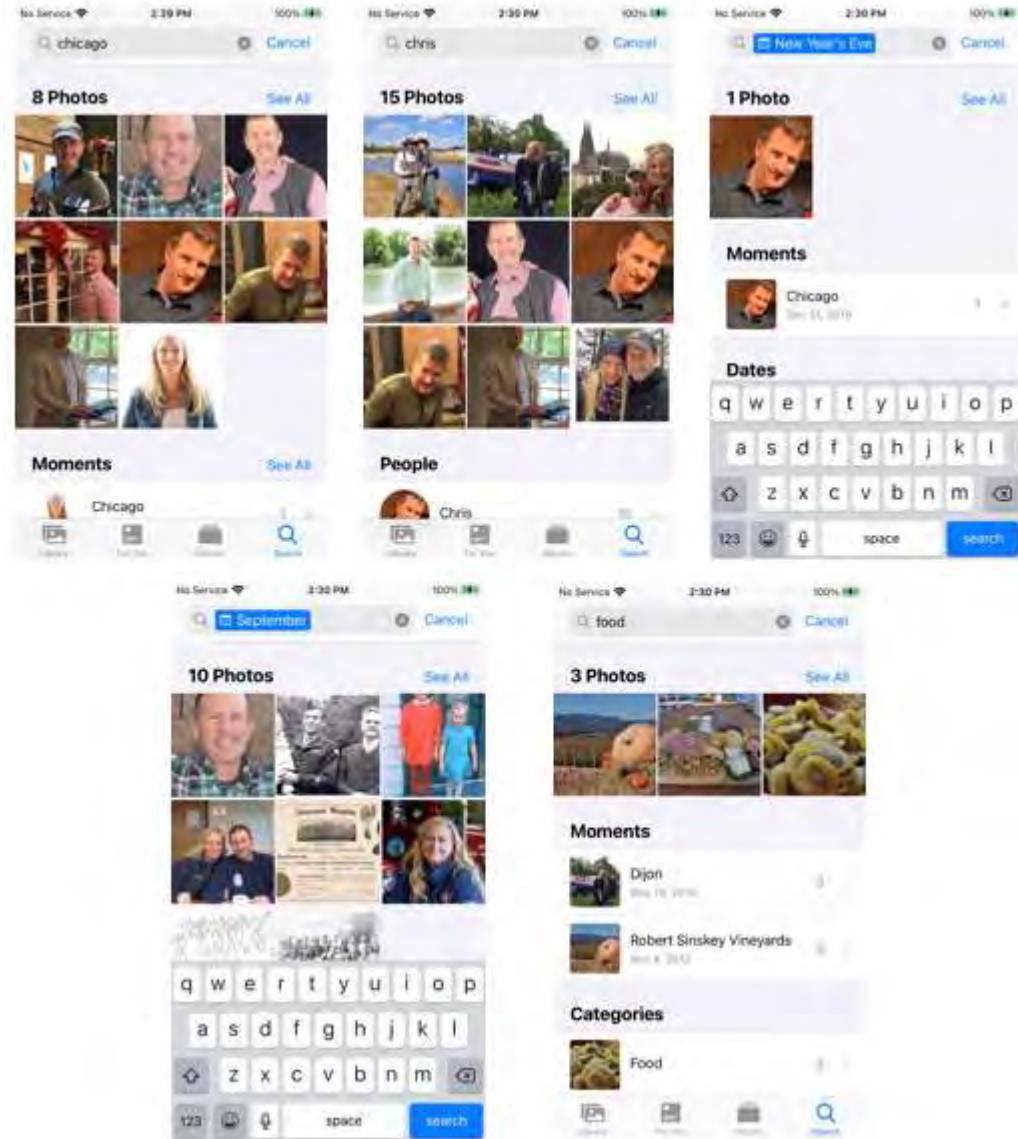
<p>digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.</p>	
<p><b>55[pre]</b> The method of claim 51, wherein</p>	<p><i>See information for claim 51.</i></p>
<p><b>55[a]</b> the first set of digital files displayed 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>

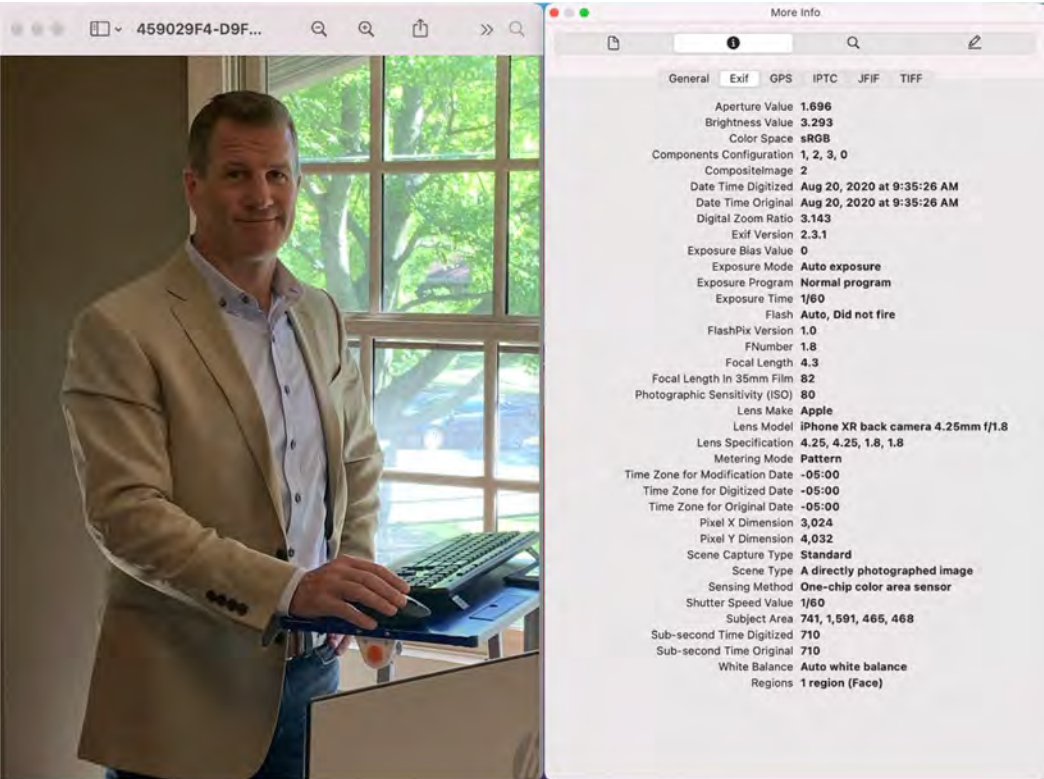
<p>interface responsive to the selection associated with the first location are not overlaid on the interactive geographic map and</p>	
<p><b>55[b]</b> the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on</p>	<p>Each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

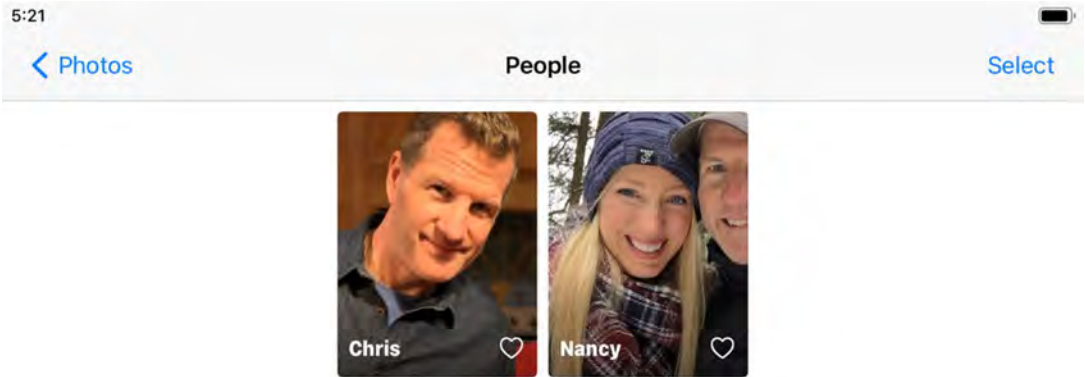
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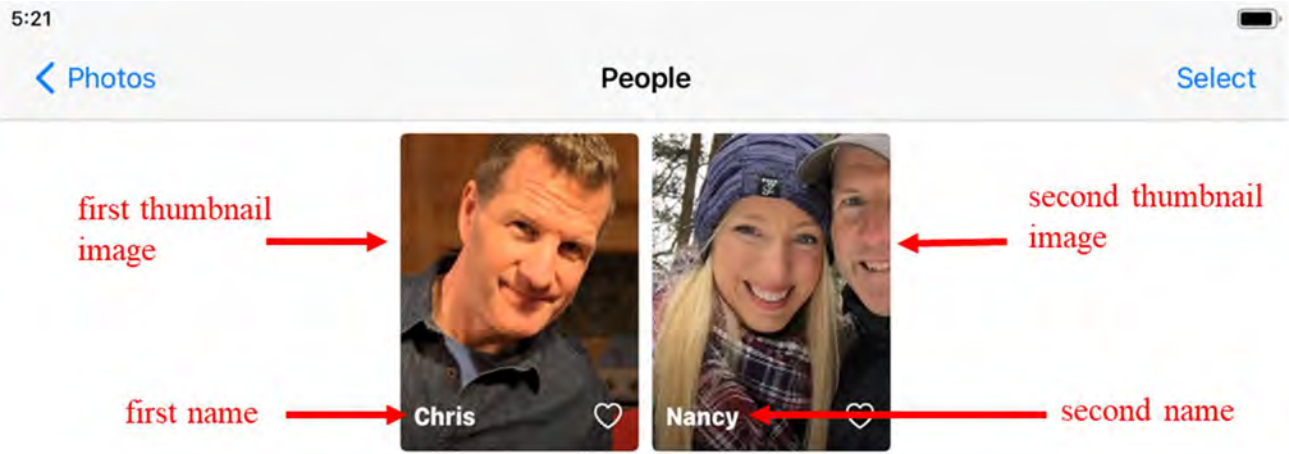
<p>first person includes a touch or click of the first thumbnail image associated with the first person.</p>	
<p><b>59.</b> The method of claim 31, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative 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**

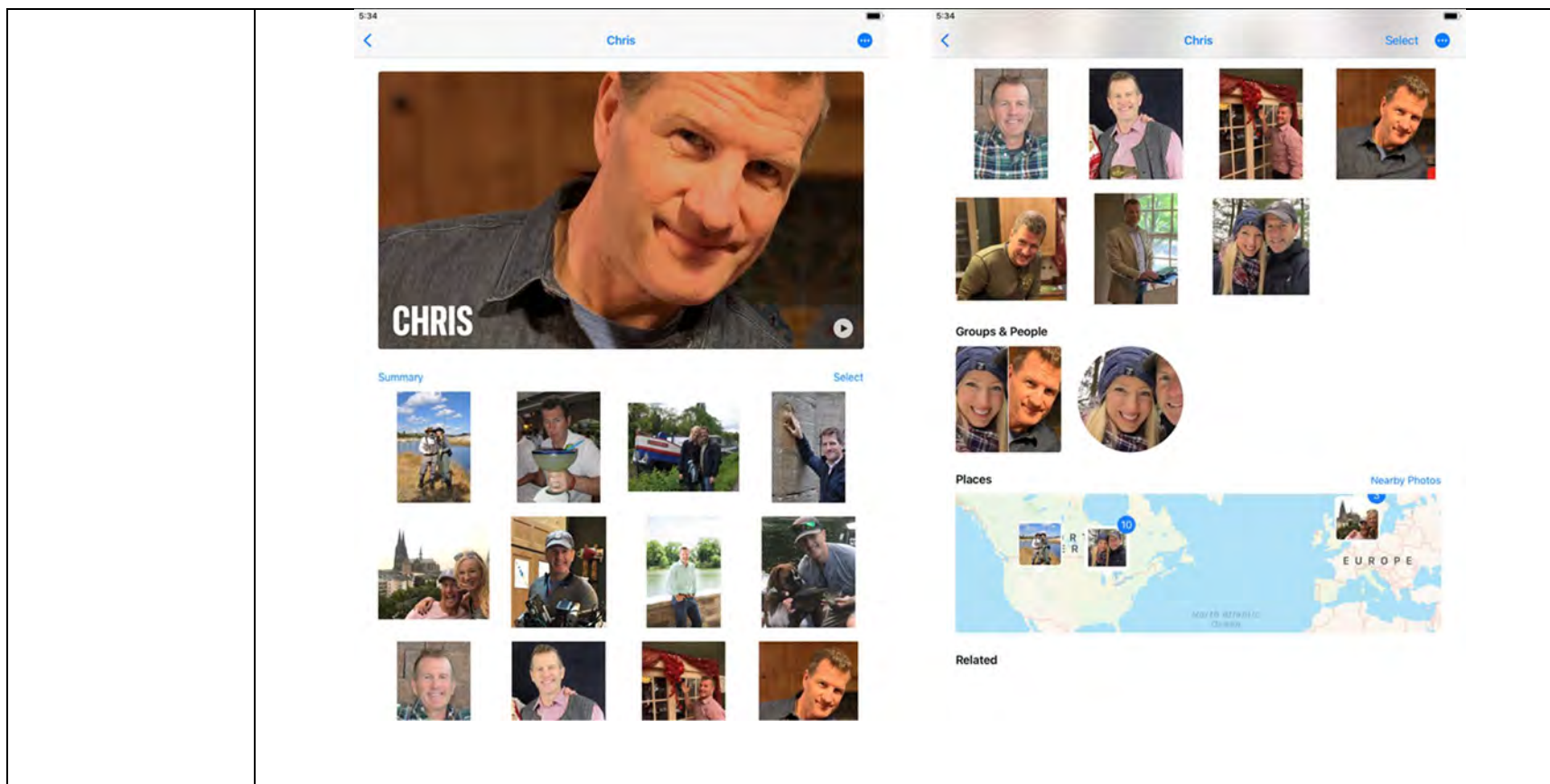
**U.S. Patent No. 11,017,020 – Infringement Claim Chart**

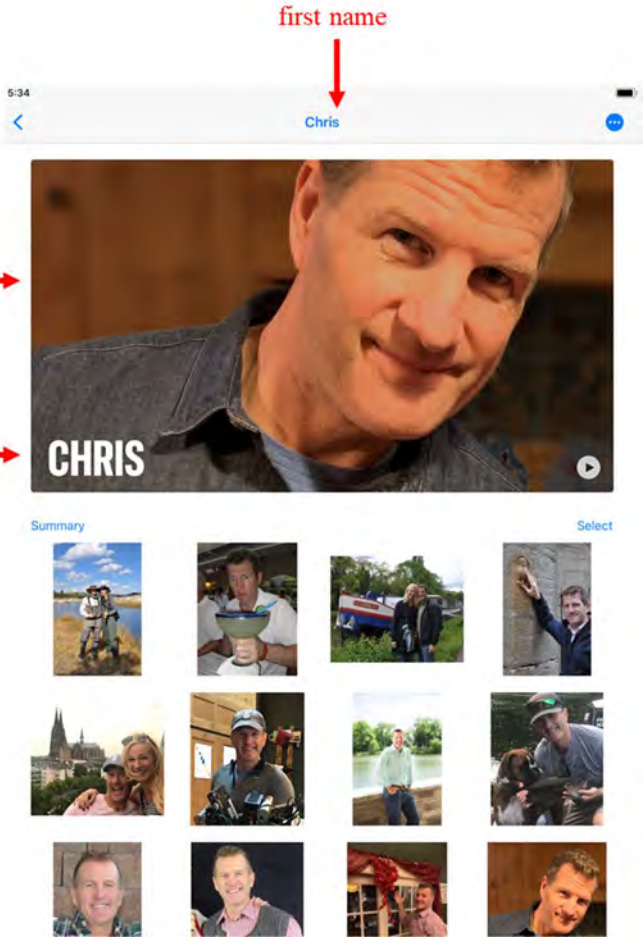
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,017,020 (“the ‘020 patent”) in the Apple iPadOS Photos application. The exemplary screenshots below were taken using an Apple iPad mini (5<sup>th</sup> Generation) running iPadOS 14.6. While 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> 

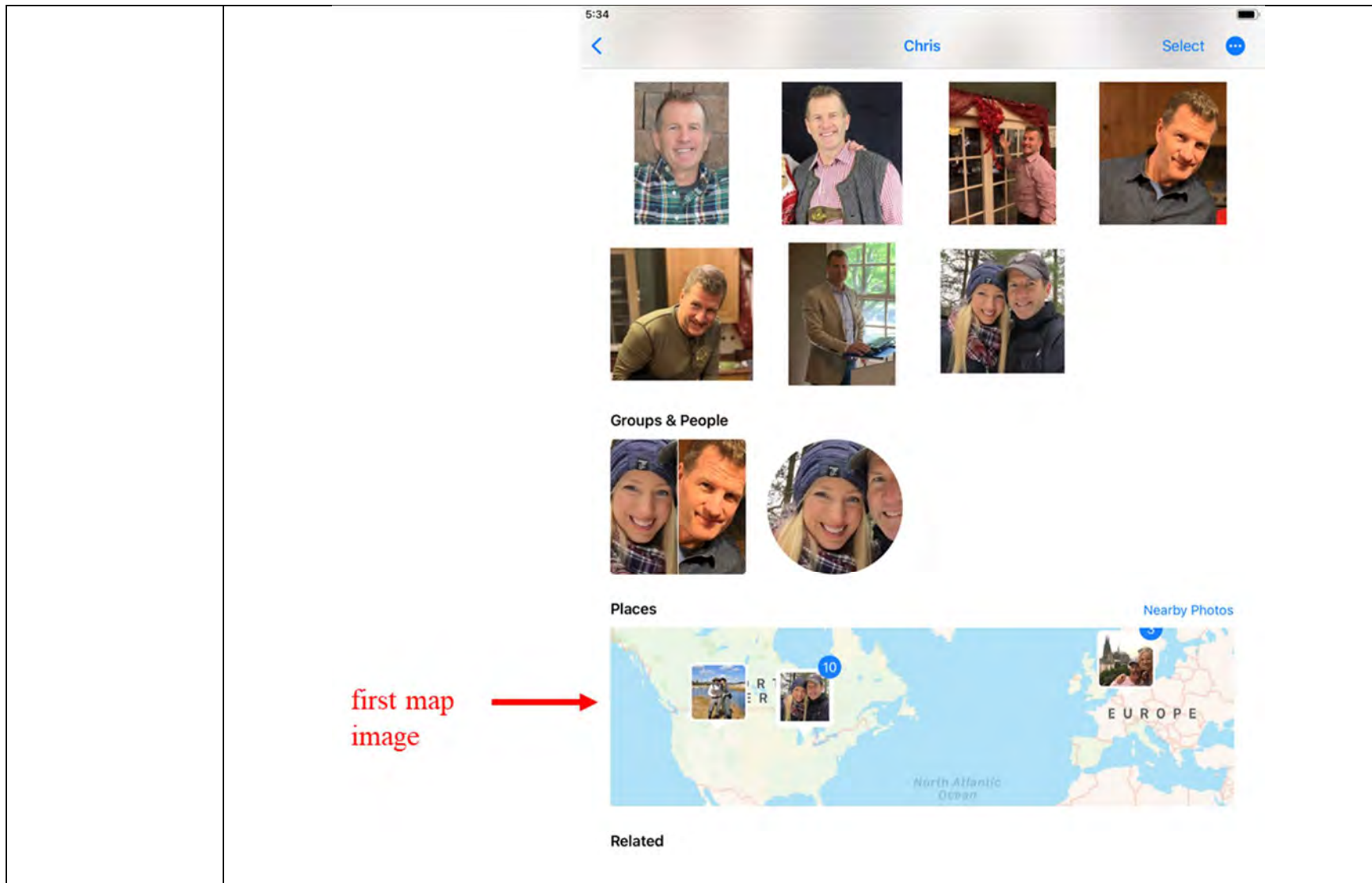
<p><b>1[a][i]</b> a first thumbnail image associated with a first person,  <b>1[a][ii]</b> a first name associated with the first person,  <b>1[a][iii]</b> a second thumbnail image associated with a second person, and  <b>1[a][iv]</b> a second name associated with the second person;</p>	<p>The people 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



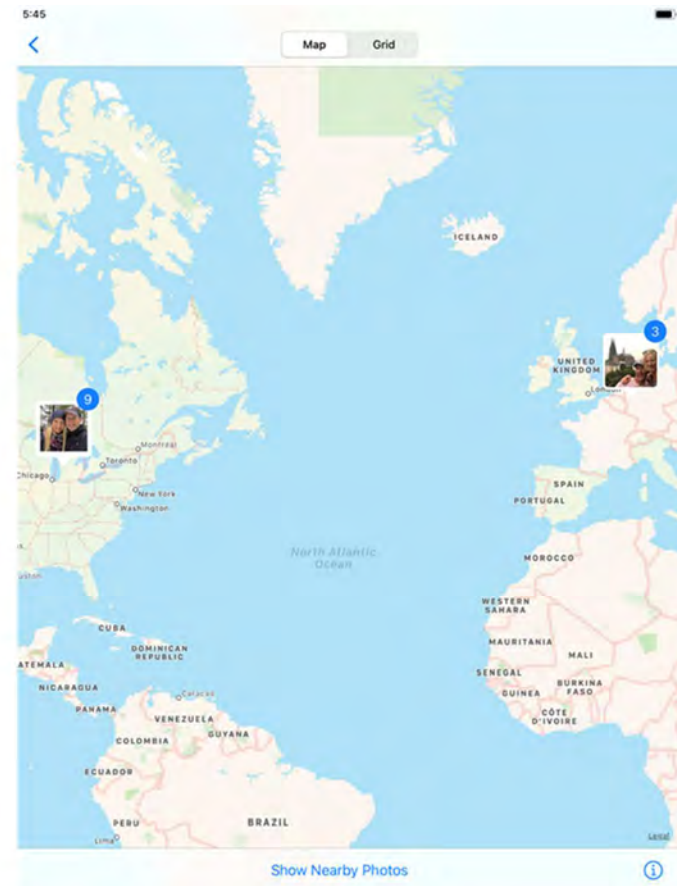
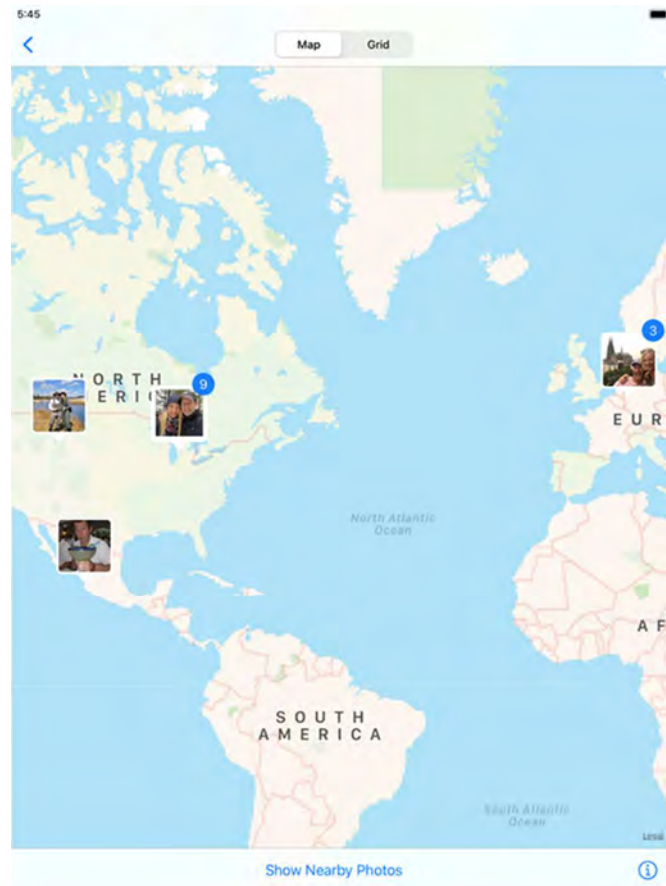
<p><b>1(b)(i)</b> a first digital file associated with the first person, <b>1(b)(ii)</b> the first name associated with the first person, and</p>	<p>The first person view includes a first digital file associated with the first person and the first name associated with the first person.</p>  <p>The screenshot 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. Below the video is a photo gallery with a grid of 12 small images. A red arrow points to the name 'CHRIS' in white text on the video thumbnail from the label 'first name' below it. The photo gallery is labeled 'Summary' on the left and 'Select' on the right.</p>
<p><b>1(b)(iii)</b> a first map image;</p>	<p>The first person view also includes a first map image.</p>





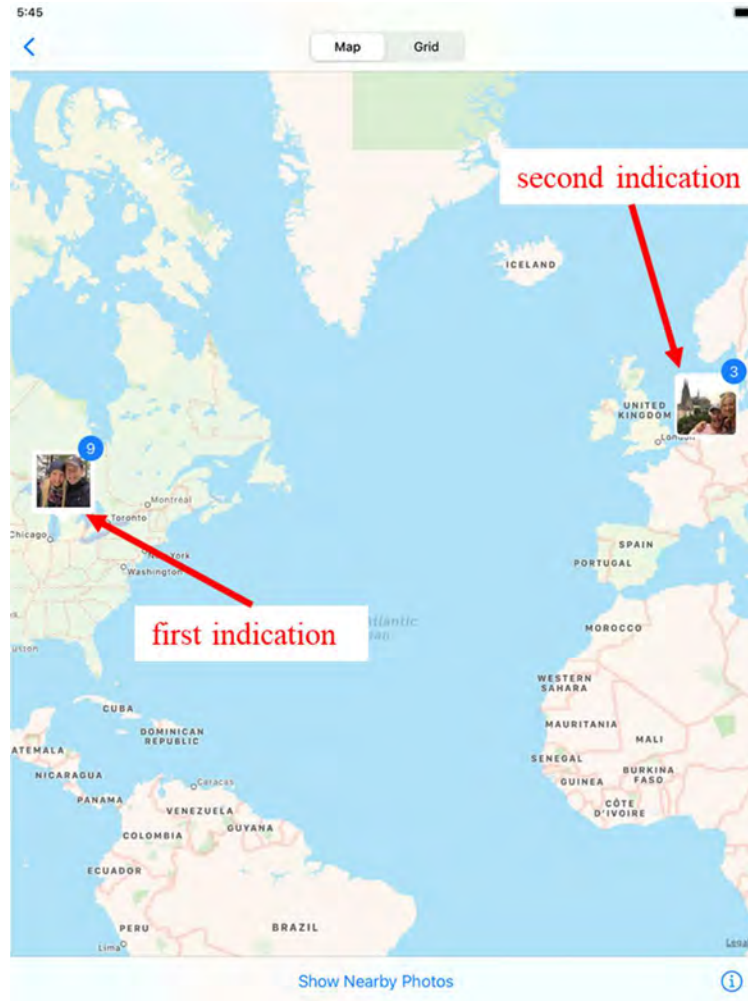
1[c] responsive to an input that is indicative of a selection of the first map image in the first person view, causing a first location view to be displayed on the interface, the first location view including: [1][c][i] an interactive geographic map,

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), 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.



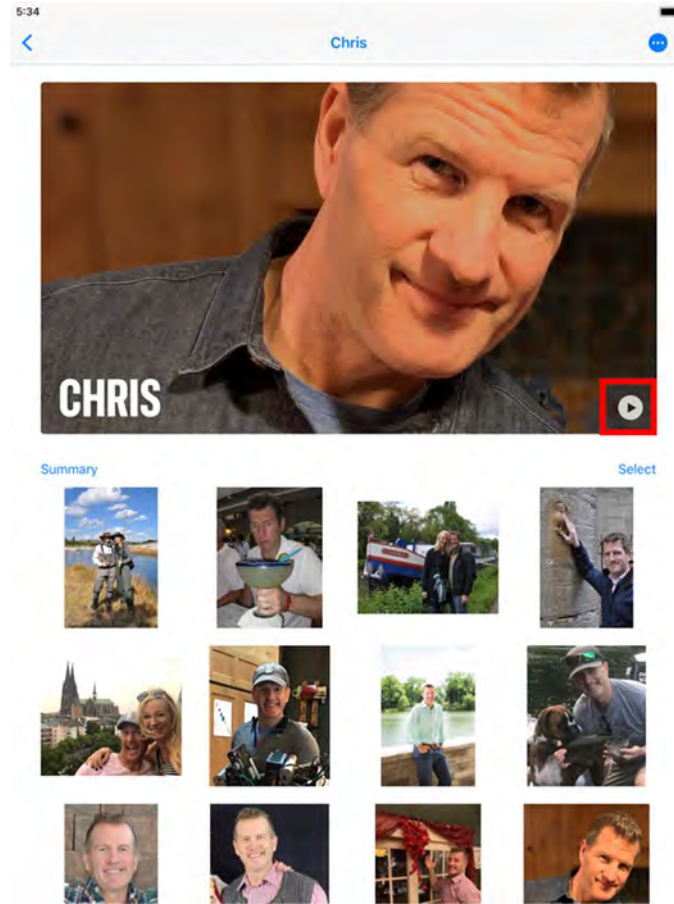
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map;  
and

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.

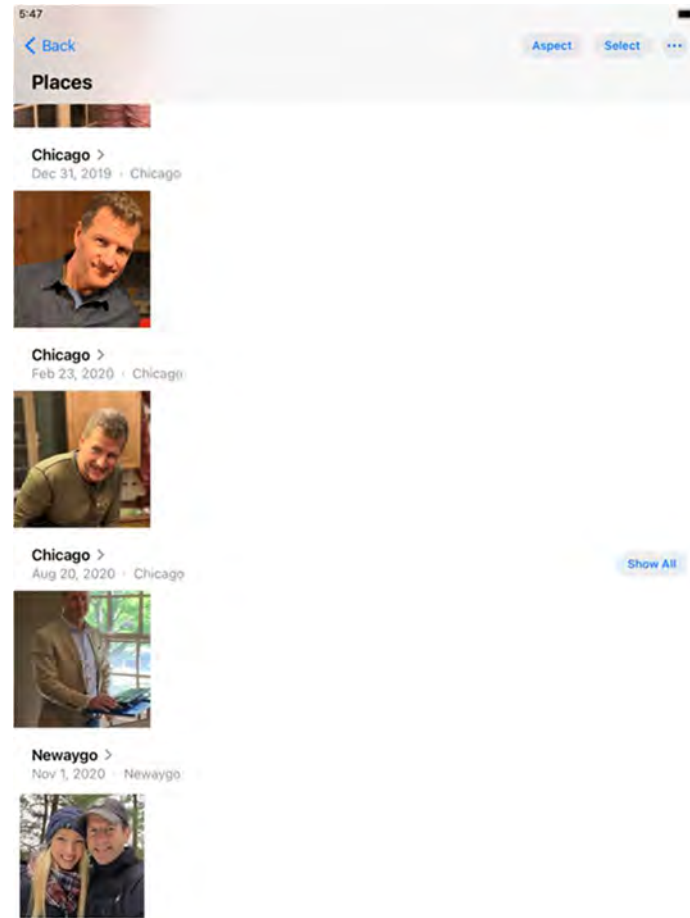
Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), iPadOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.



See MW\_Apple\_003184 for an exemplary slideshow.

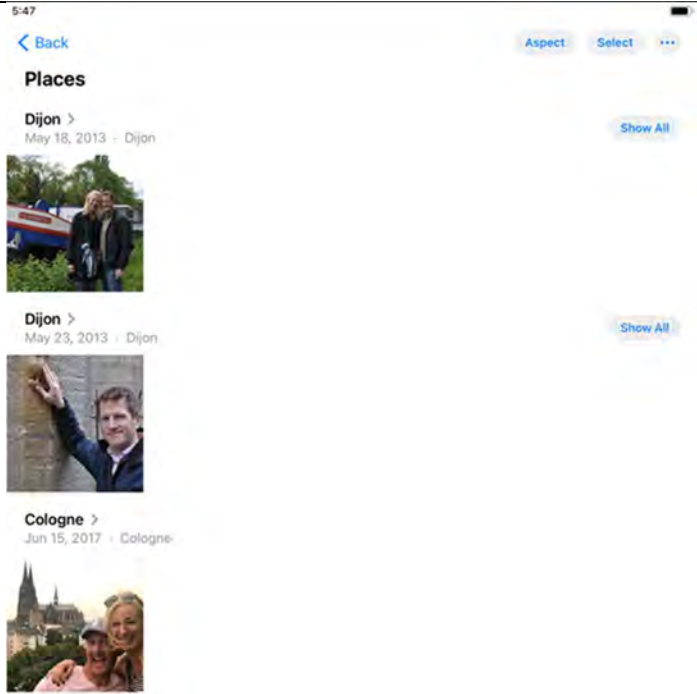
2. The method of claim 1, wherein the first indication is associated with a first set of digital files and the first location, and the second indication is associated with a second set of digital files and the second location.

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



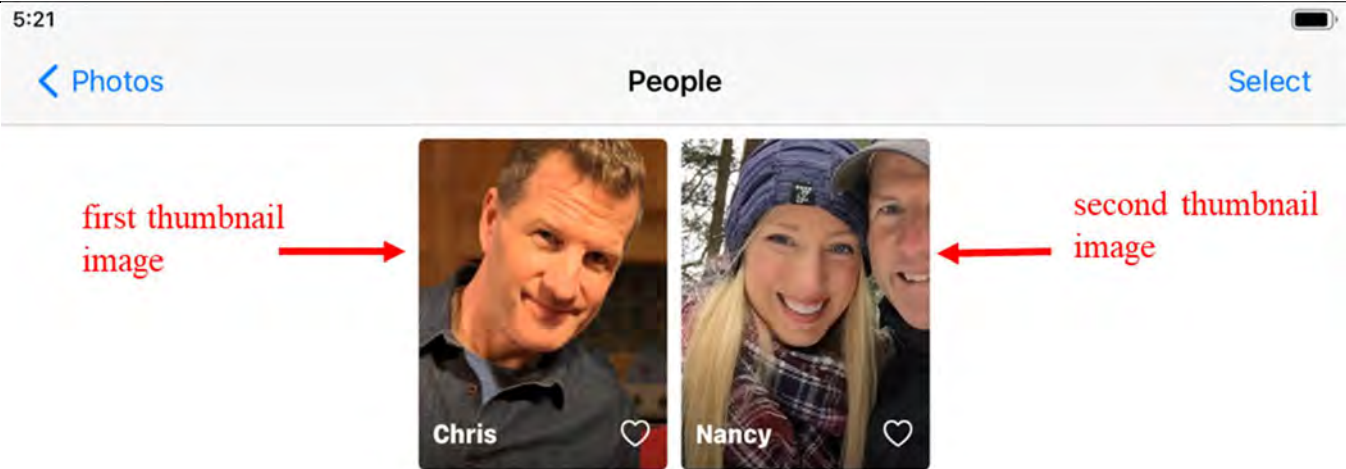
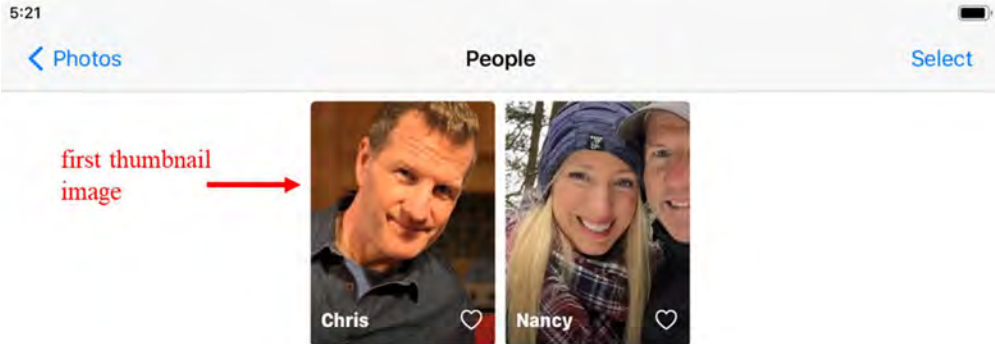
The second indication is associated with a second set of digital files and the second location.

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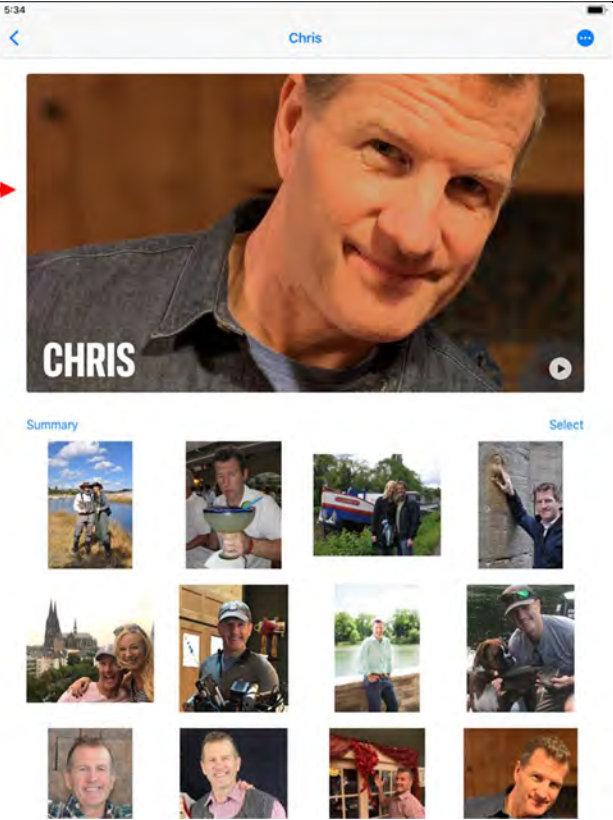
	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and 'Aspect', 'Select', and a three-dot menu icon. The gallery is titled 'Places' and contains three entries:</p> <ul style="list-style-type: none"> <li><b>Dijon</b> &gt; (May 18, 2013 · Dijon): A 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>

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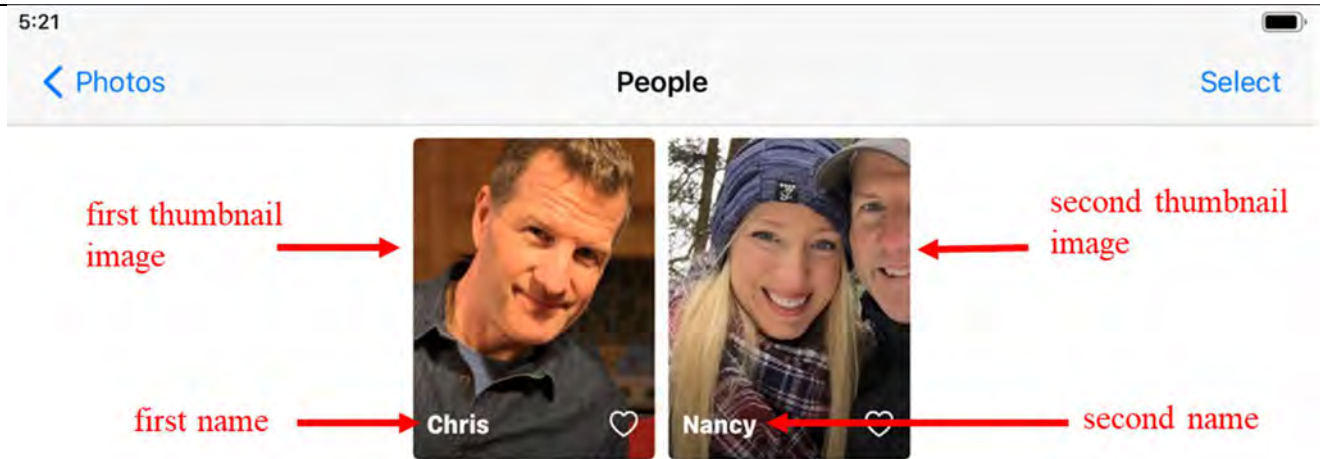
<p>4. The method of claim 3, wherein the first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of the second person.</p>	<p>The first thumbnail image includes at least a portion of a face of the first person 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>5:34 Chris</p> <p>first digital file →</p> <p>CHRIS</p> <p>Summary Select</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.

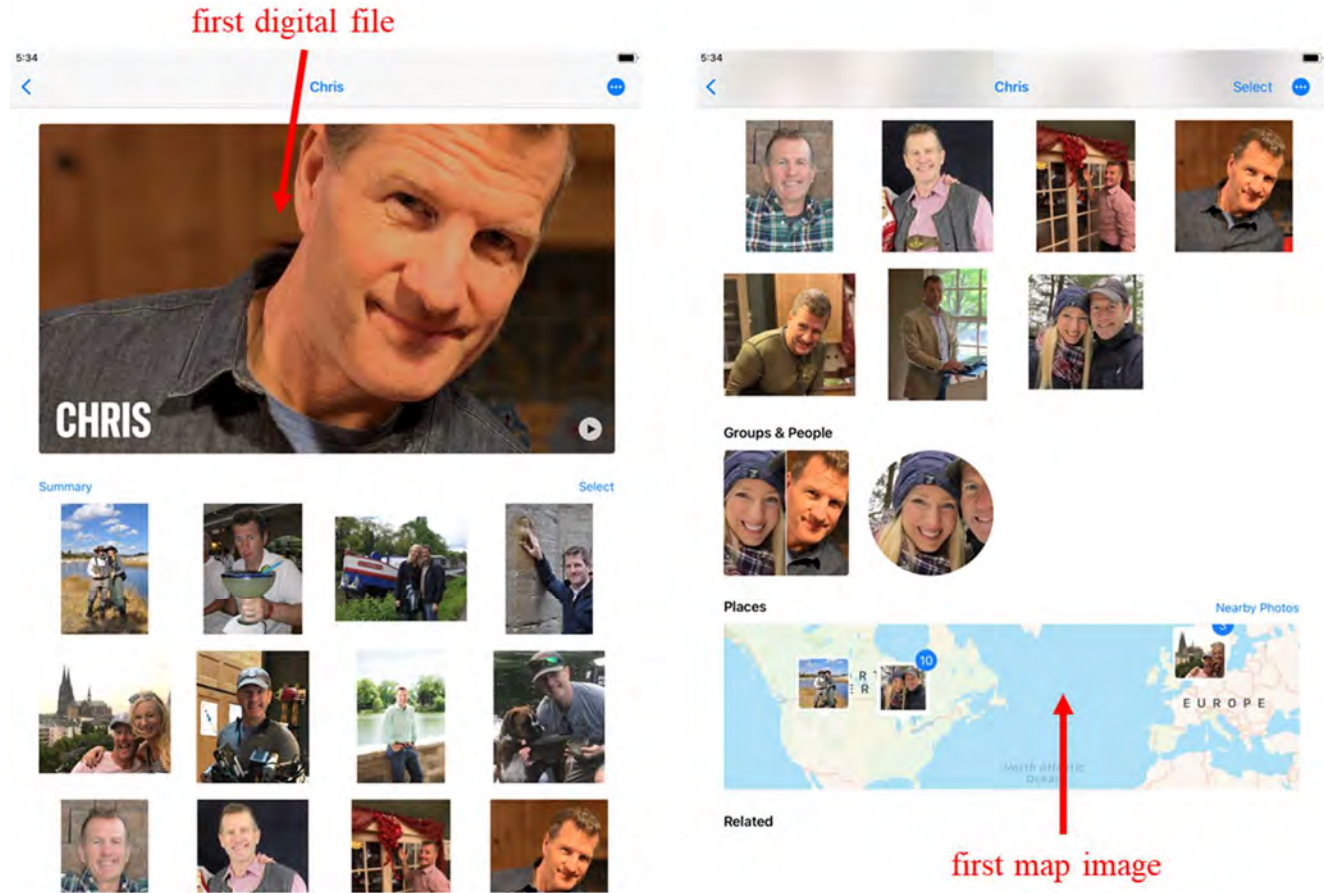


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

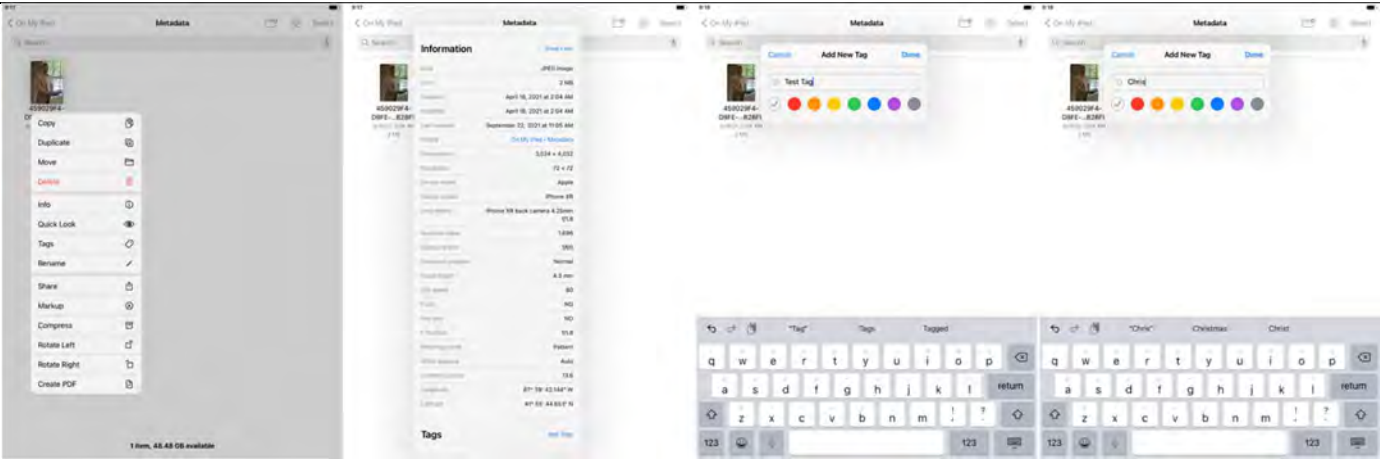


8. The method of claim 1, further comprising, prior to the causing the

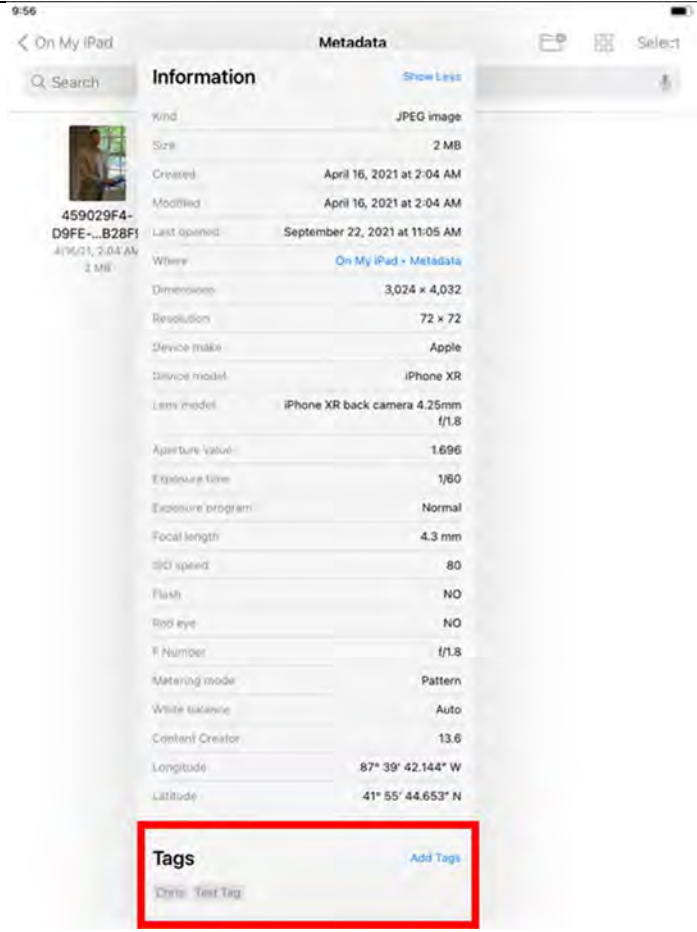
See information for claim 1.

<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>The screenshot shows the Photos app interface on an iPad. At the top, there are navigation options: '&lt; Photos', 'Years', 'Months', 'Days', and 'All Photos'. Below this, a date range 'Nov 4, 2012 - Sep 13, 2021' and a location 'Chicago - Lincoln Park' are displayed. The main area is a grid of photo thumbnails. A red rectangular box highlights one specific photo in the grid, which depicts a man wearing a brown jacket and a hat, standing outdoors. Other photos in the grid include various scenes of people, animals, and objects.</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>

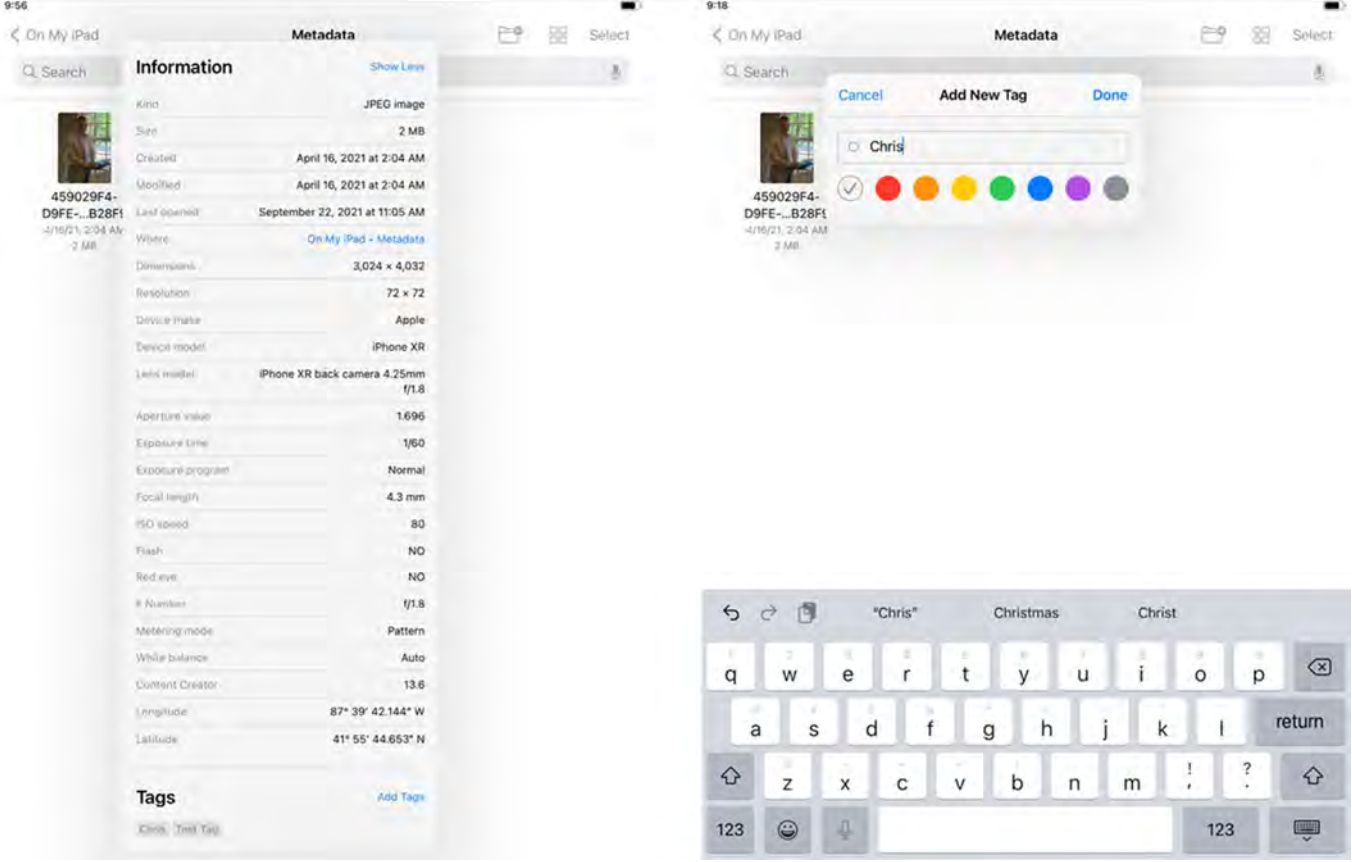
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	 <p>The image displays four sequential screenshots of the iPadOS Metadata interface. The first screenshot shows a file with a context menu open, highlighting the 'Tags' option. The second screenshot shows the 'Information' screen for the file, listing 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 the tag 'Chris' entered. Below the screenshots are two keyboard overlays: the first shows the 'Tag' keyboard with the 'Tag' key highlighted, and the second shows the 'Chris' keyboard with the 'Chris' key highlighted.</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>

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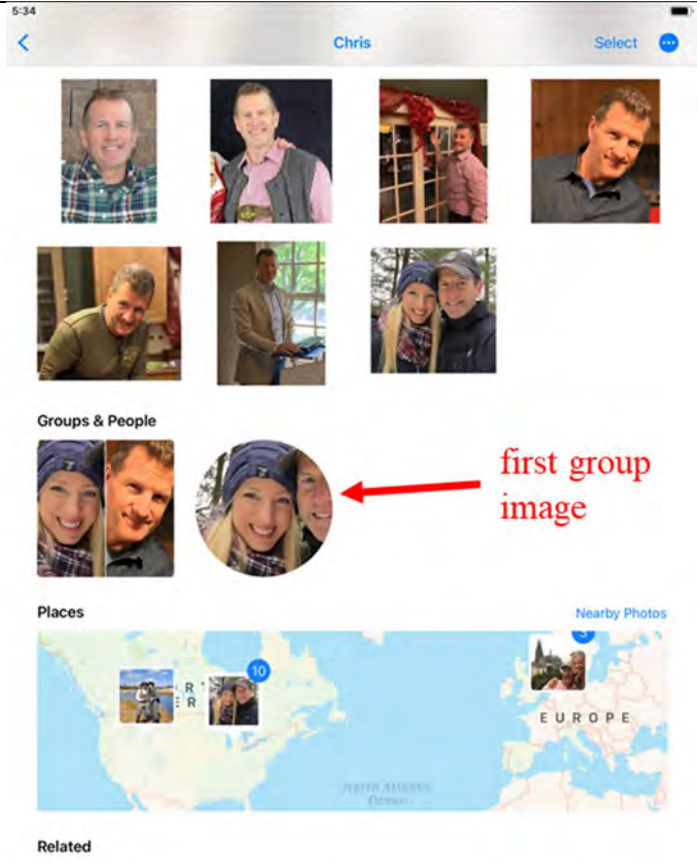
	 <p>The screenshot shows the 'Metadata' page for a photo on an iPad. The photo is titled '459029F4-D9FE-...B28F' and is a JPEG image, 2 MB in size. The metadata includes creation and modification dates of April 16, 2021, and a last opened date of September 22, 2021. The photo was taken on an iPhone XR. The 'Tags' section at the bottom, highlighted with a red box, shows a single tag: '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>

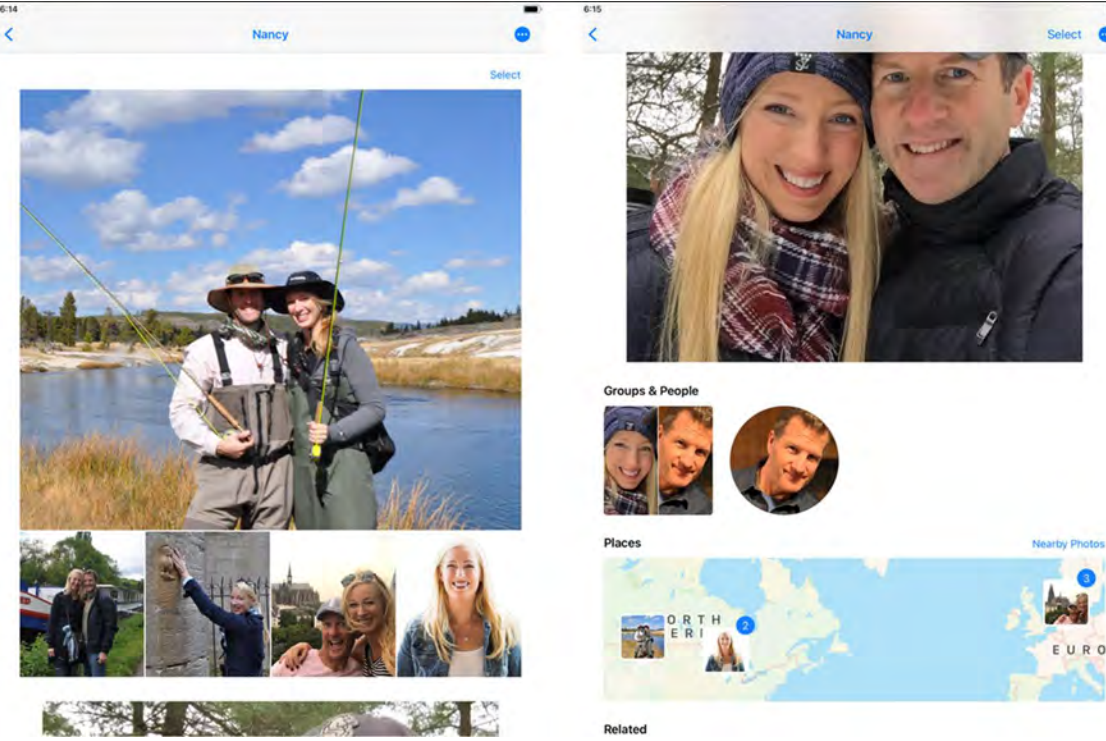
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	 <p>This is also true when tagging digital files after Photos recognizes faces.</p>
<p><b>10.</b> The method of claim 9, further comprising exporting the first digital file to a remote device, the</p>	<p>iPadOS exports the first digital file to a 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>

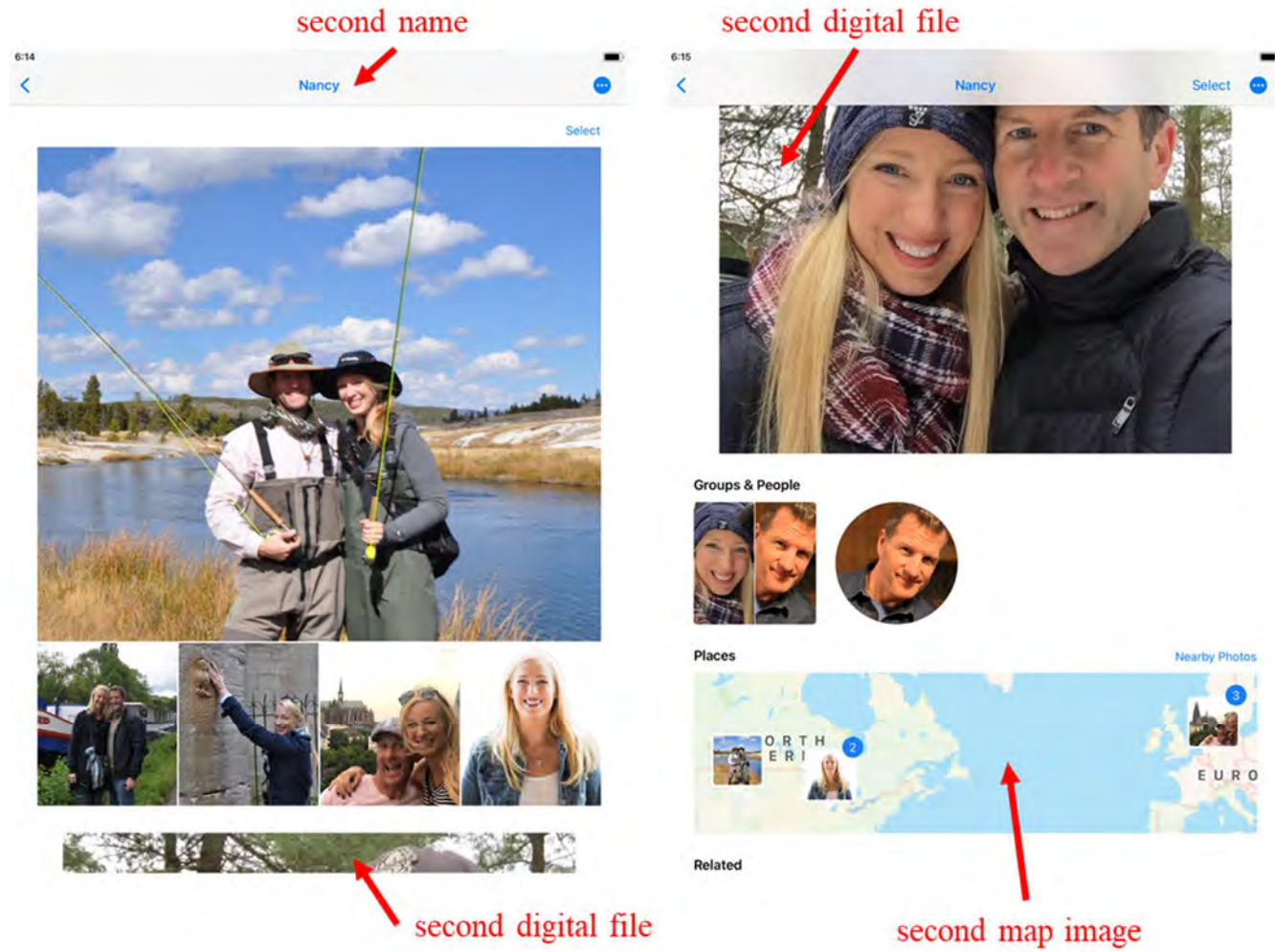
<p>exported first digital file including information associated with the first user-generated tag.</p>	
<p><b>11[pre]</b> The method of claim 1, wherein</p>	<p><i>See information for claim 1.</i></p>
<p><b>11[a]</b> the first person view includes a first group image, and</p>	<p>The first person view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

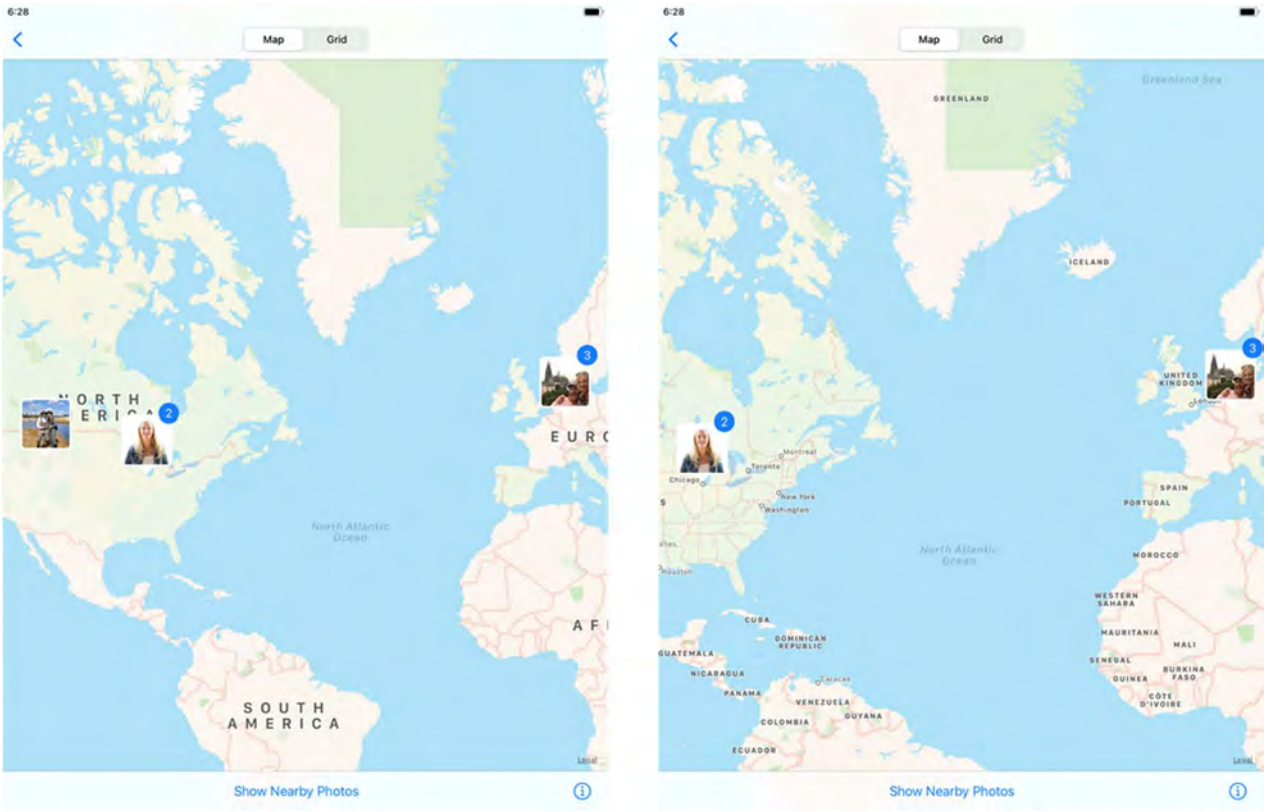
<p>interface, the first group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>12.</b> The method of claim 11, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information 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>

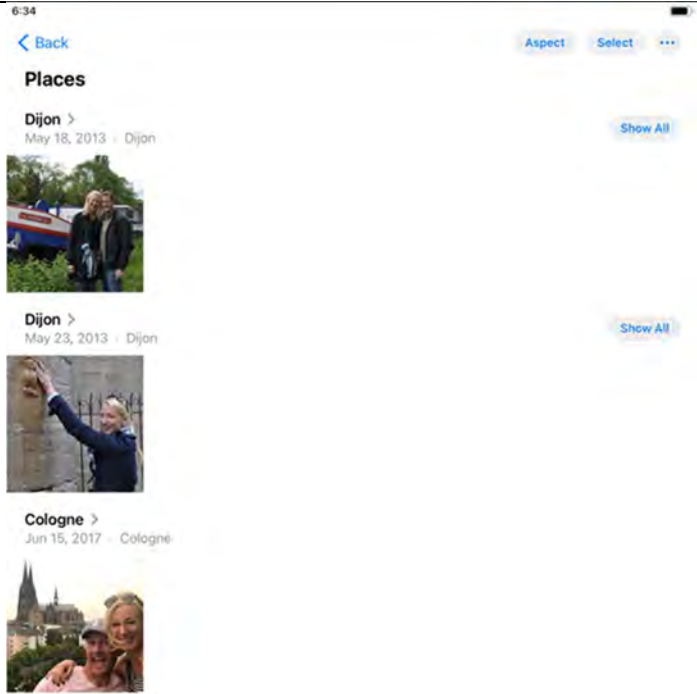
<p>a third indication positioned at a third location on the interactive geographic map, and a fourth indication positioned at a fourth location on the interactive geographic map.</p>	
<p><b>15.</b> The method of claim 14, wherein the third indication is associated with a third set of digital files and 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.

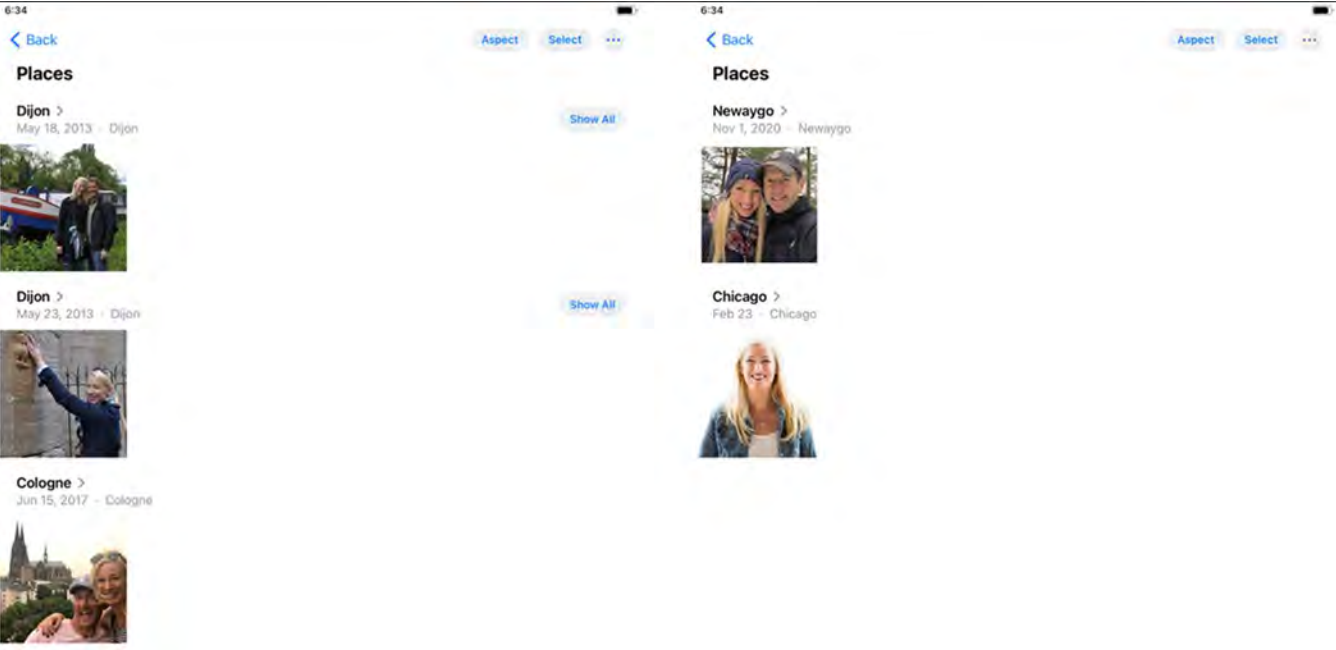


The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iPadOS displays the view below responsive to tapping the fourth indication.

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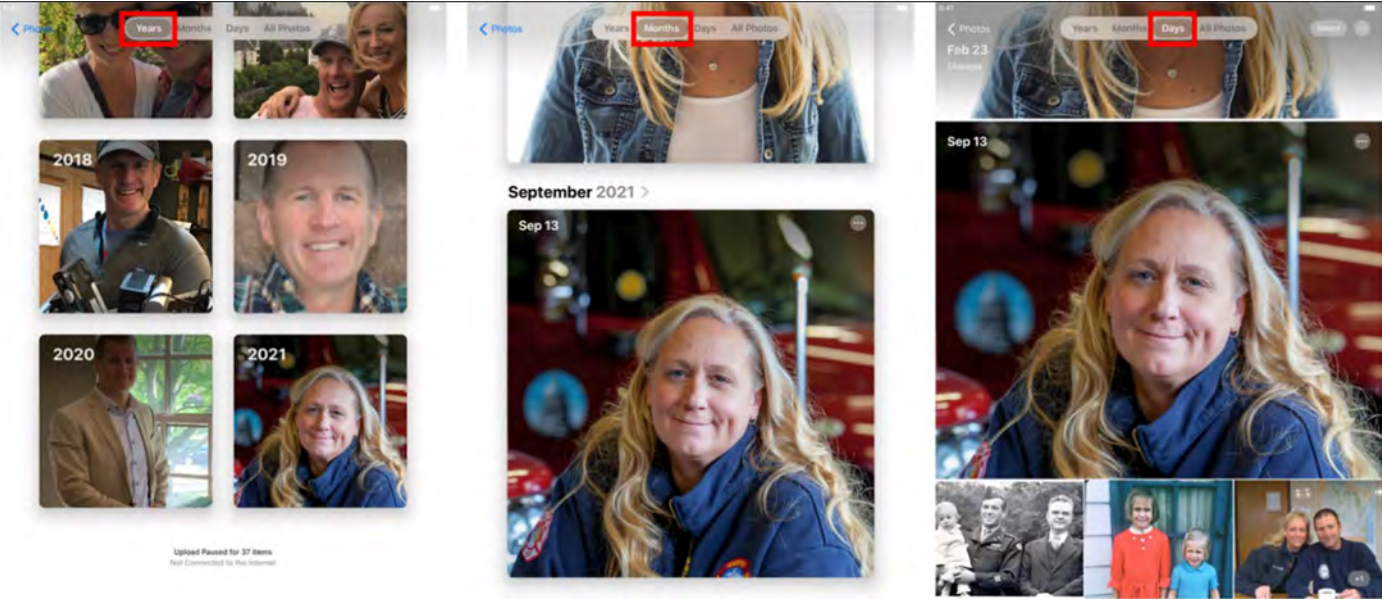
	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and options for 'Aspect', 'Select', and a menu icon. The gallery is titled 'Places' and lists three locations: 'Dijon' (May 18, 2013), 'Dijon' (May 23, 2013), and 'Cologne' (Jun 15, 2017). Each location entry includes a small thumbnail image and a 'Show All' button to the 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>

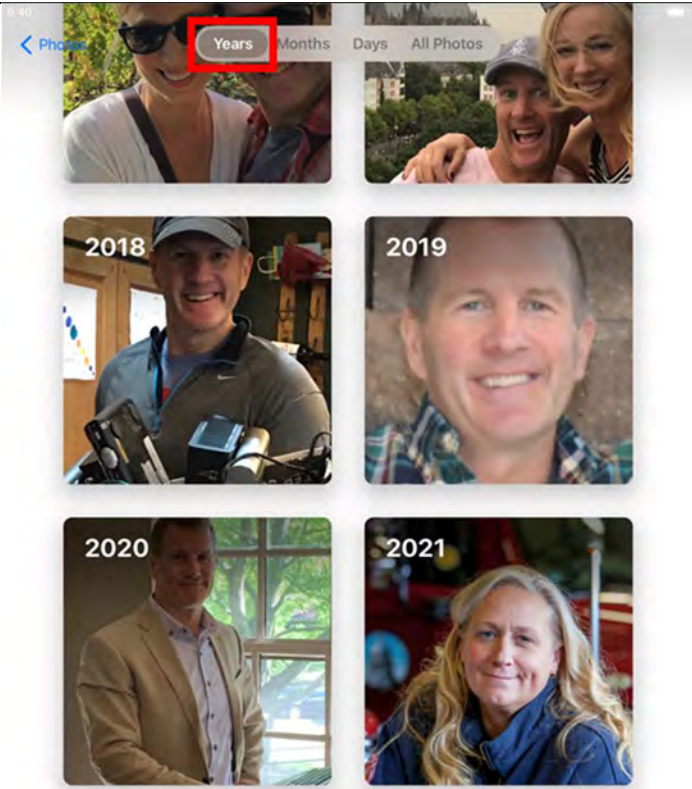
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	 <p>The image shows two side-by-side screenshots of the iPadOS Photos app. Both screenshots are taken at 6:34. The left screenshot shows a 'Places' view with three entries: 'Dijon &gt;' (May 18, 2013), 'Dijon &gt;' (May 23, 2013), and 'Cologne &gt;' (Jun 15, 2017). Each entry includes a photo thumbnail and a 'Show All' button. The right screenshot shows a 'Places' view with two entries: 'Newaygo &gt;' (Nov 1, 2020) and 'Chicago &gt;' (Feb 23 - Chicago). Each entry includes a photo thumbnail and a 'Show All' button. The interface includes a 'Back' button, 'Aspect', 'Select', and a three-dot menu icon at the top.</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>

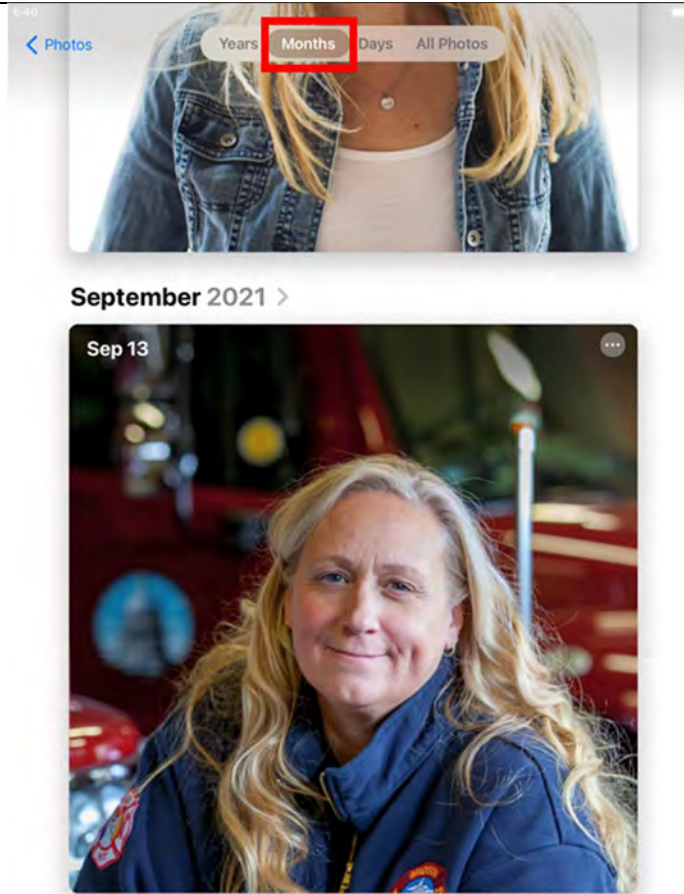


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<p>files by year, month, and day.</p>	
<p><b>18[pre]</b> The method of claim 17, further comprising:</p>	<p>See information for claim 17.</p>
<p><b>18[a]</b> responsive to receiving a year input, grouping the plurality of digital files based on year 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>

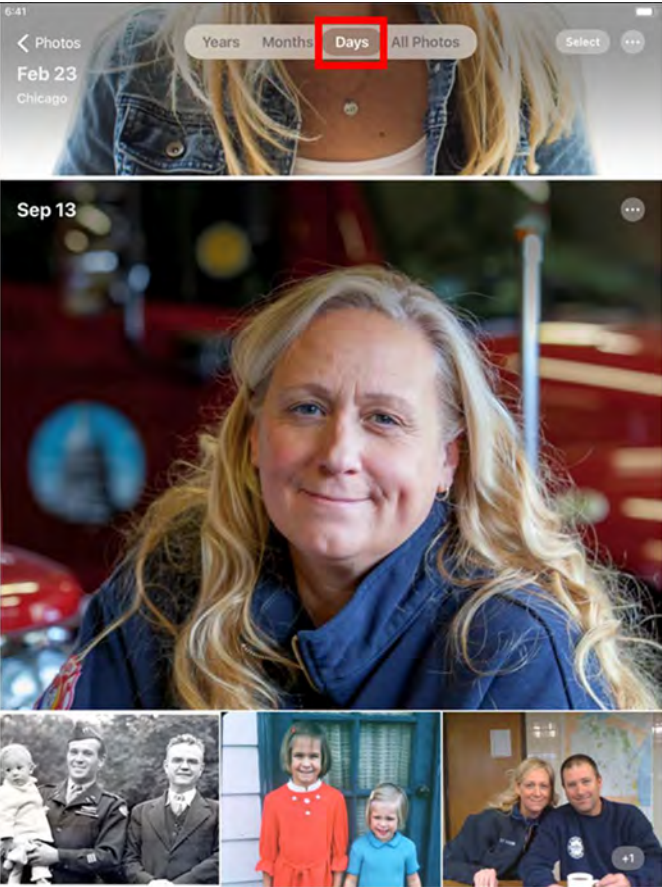
<p>displayed on the interface;</p>	 <p>The screenshot shows the iPadOS Photos app interface. At the top, there are navigation options: '&lt; Photos', 'Years' (highlighted with a red box), 'Months', 'Days', and 'All Photos'. Below the navigation bar, there are two rows of photo thumbnails. The first row 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

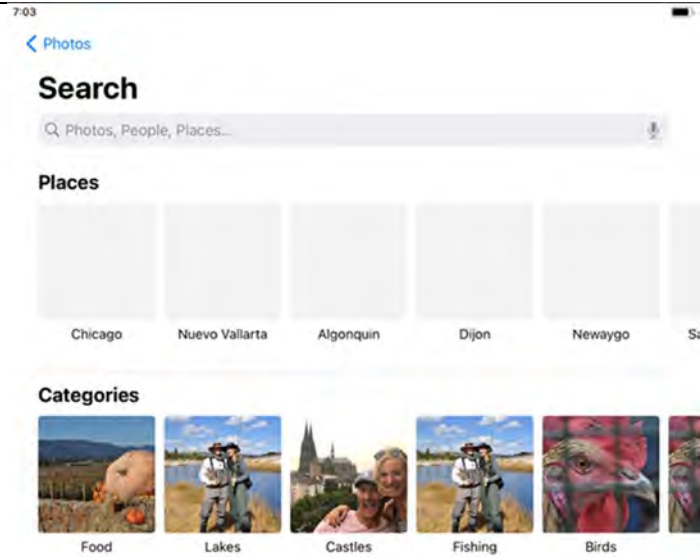


**18[c]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital

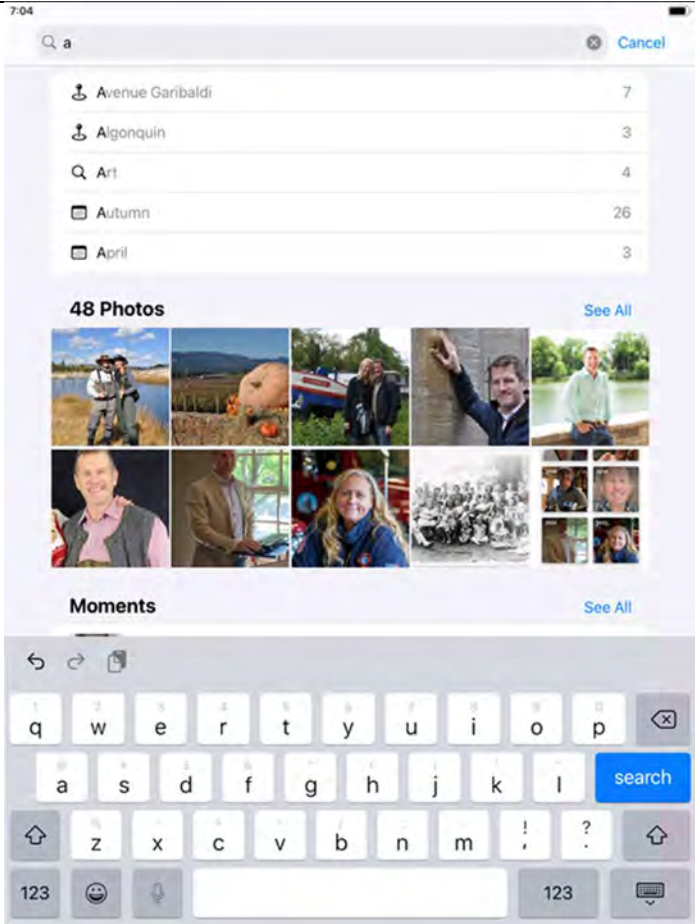
Responsive to receiving a day input (e.g., tapping the “Days” element), iPadOS groups the plurality of digital files based on day and causes at least one of the plurality of digital files to be displayed on the interface.

<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.

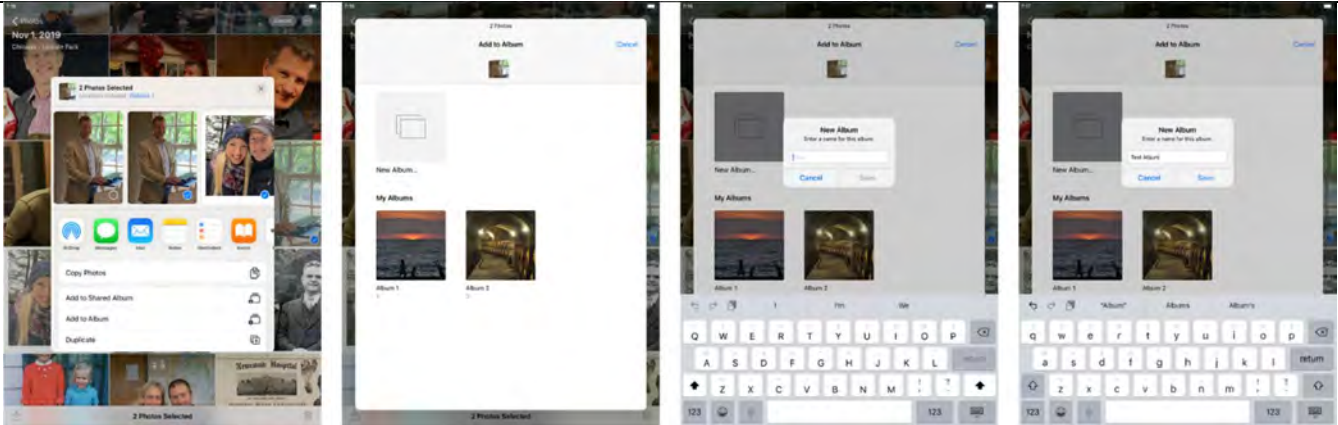


Further, iPadOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion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

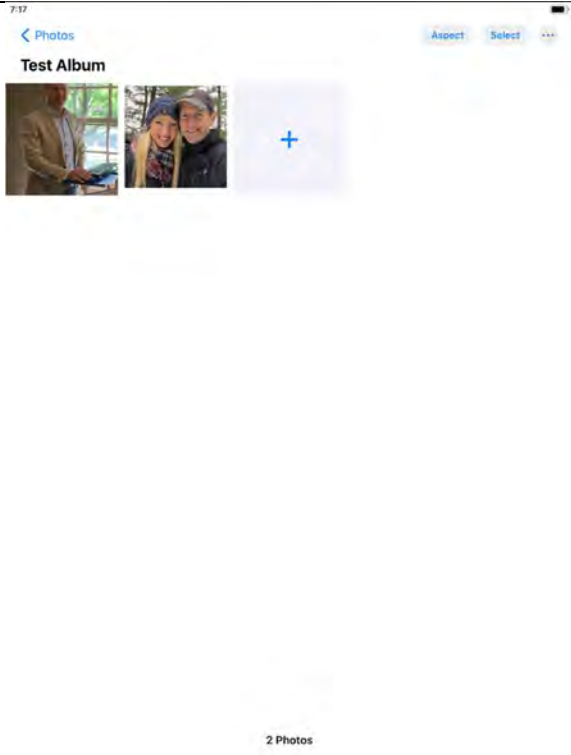
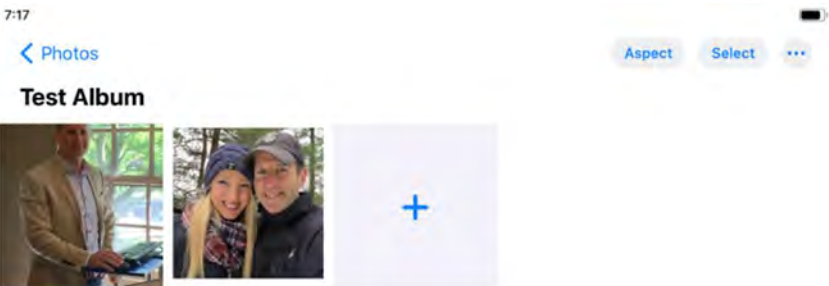
	 <p>The screenshot shows the iPadOS search interface. At the top, the search bar contains the letter 'a'. Below the search bar, there is a list of search results: Avenue Garibaldi (7), Algonquin (3), Art (4), Autumn (26), and April (3). Below the list, there is a section titled '48 Photos' with a 'See All' link. The photos are displayed in a grid. Below the photos, there is a section titled 'Moments' with a 'See All' link. At the bottom of the screen, a keyboard is visible with the letter 'a' highlighted in the second row.</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>

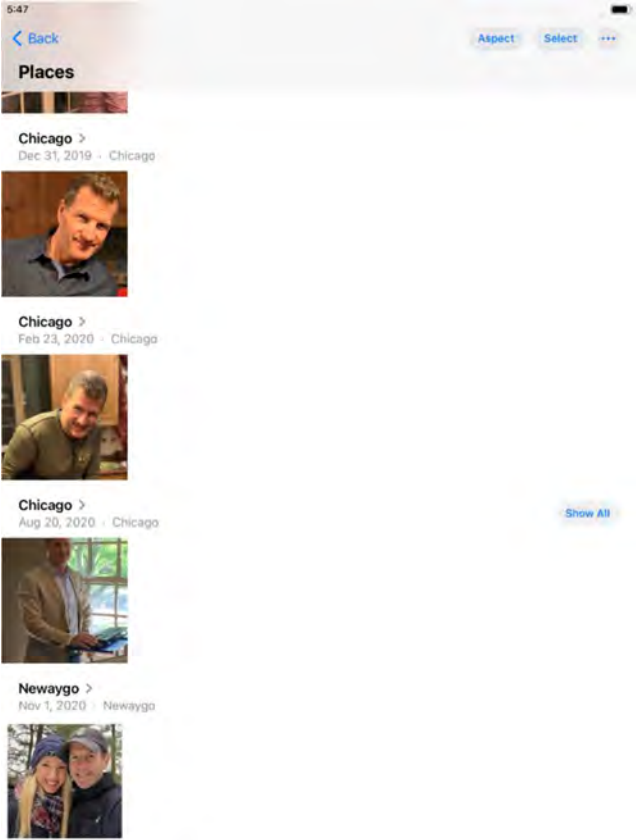
<p><b>20[a]</b> causing a plurality of images to be displayed on the interface;</p>	<p>iPadOS causes a plurality of images to be displayed on the interface.</p> 
<p><b>20[b]</b> receiving alphanumeric text as the album name;</p>	<p>iPadOS receives alphanumeric text as the album name. For example, iPadOS 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>

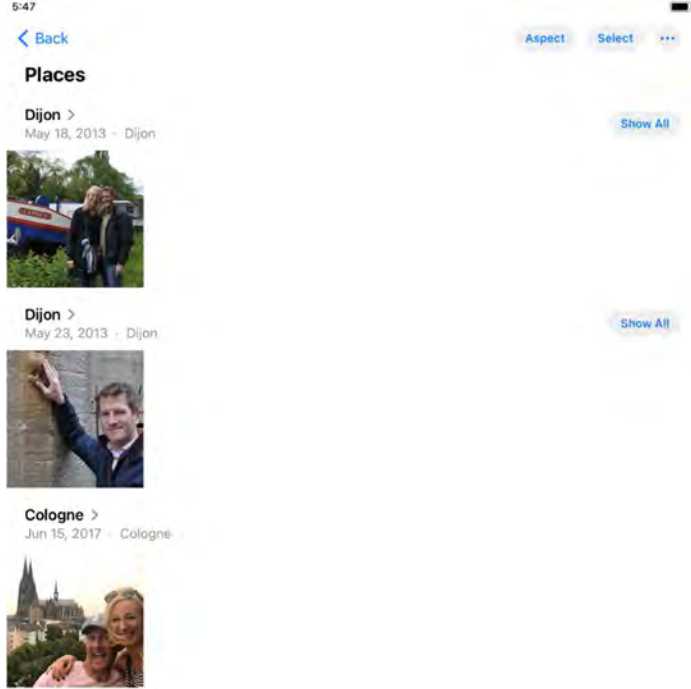
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<p>20[c] causing each of the plurality of images to be associated with an album name; and</p>	<p>iPadOS causes each of the plurality of images to be associated with an album name. For example, as shown below, each of the plurality of images are displayed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

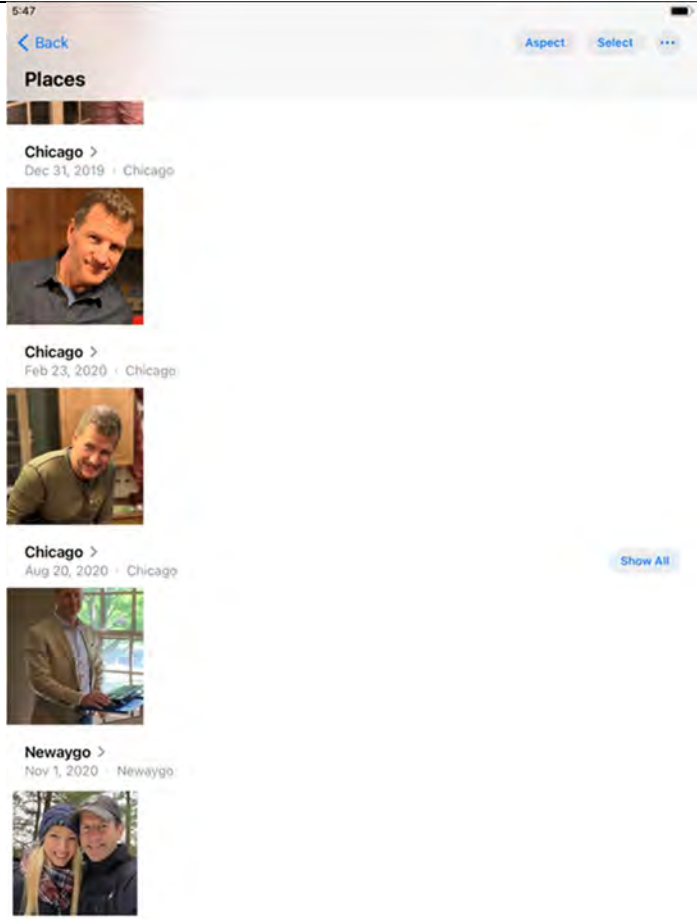
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.

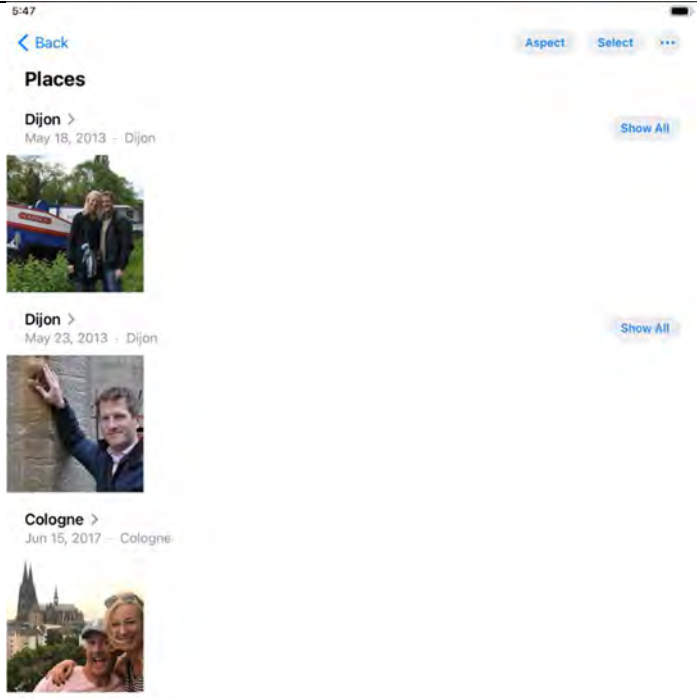


**23.** The method of claim 3, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

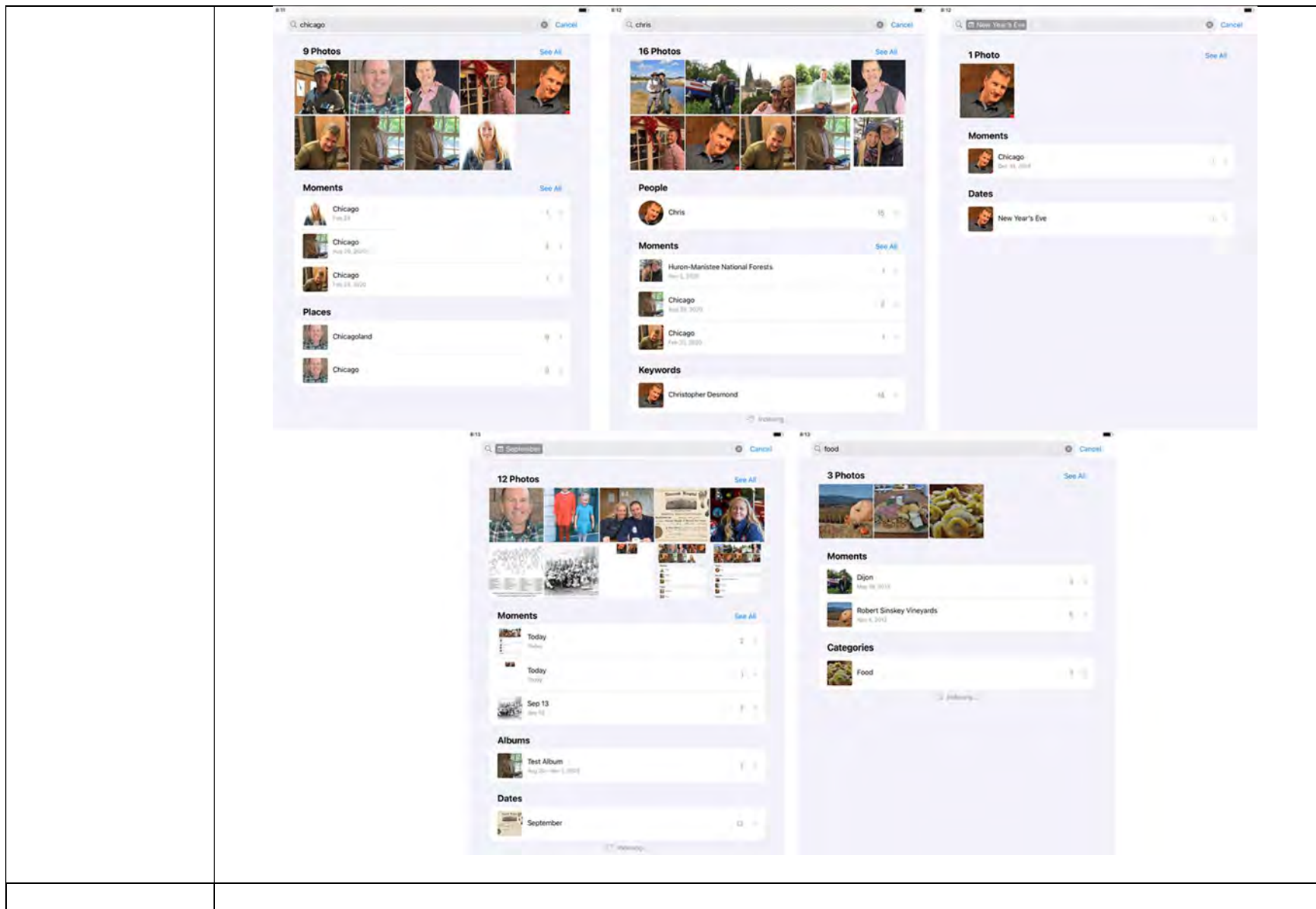
Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.

<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' list. The list includes entries for 'Dijon' (May 18, 2013) and 'Cologne' (Jun 15, 2017). Each entry has a small photo and a 'Show All' button. The list is overlaid on a map background.</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>

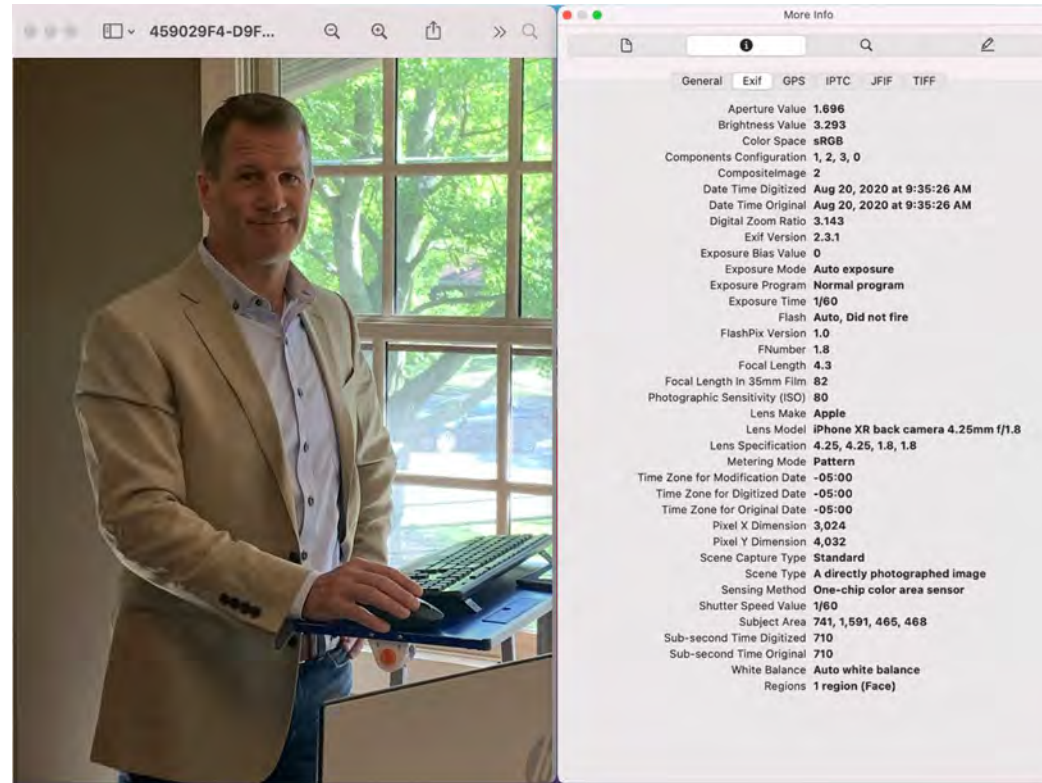
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**27.** The method of claim 10, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data associated with the first digital file.

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.



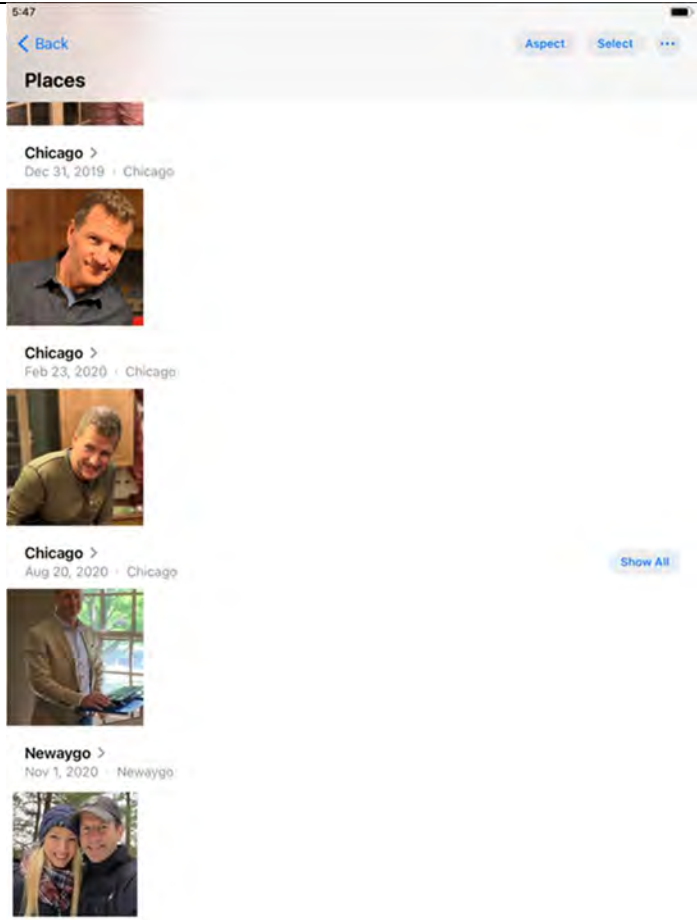
**28.** The method of claim 1, wherein the input that is indicative of the selection of the first person

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].

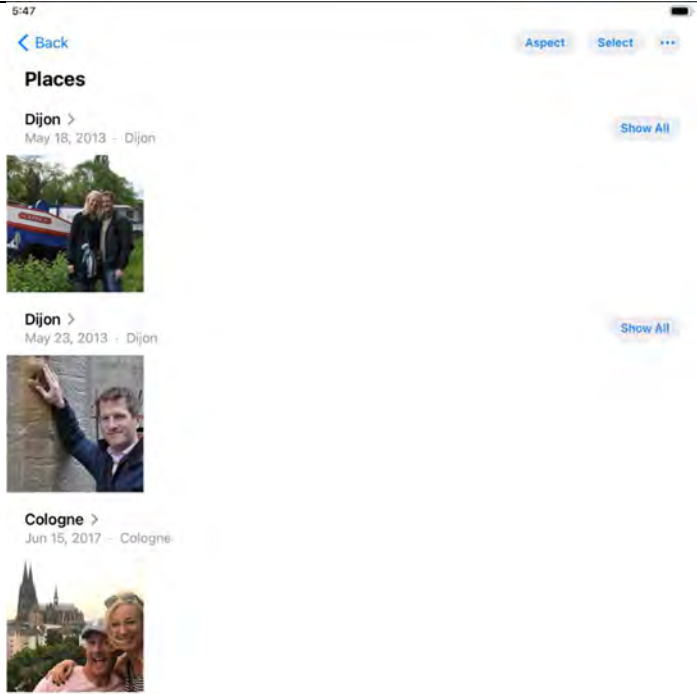
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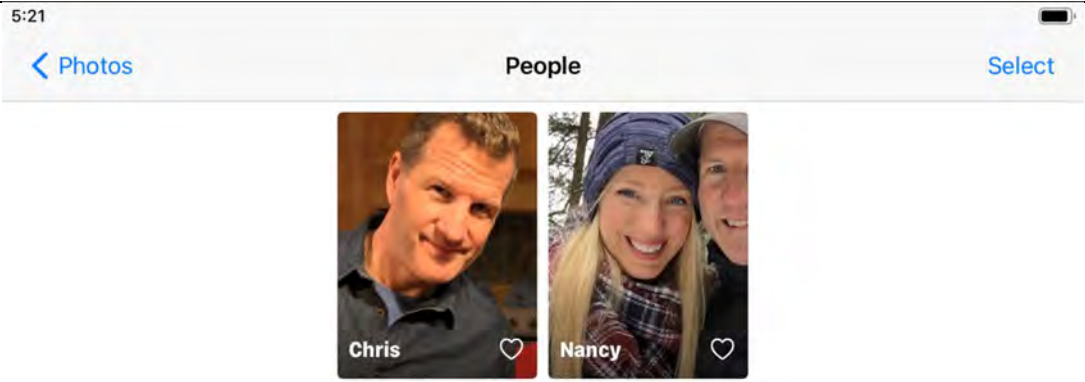
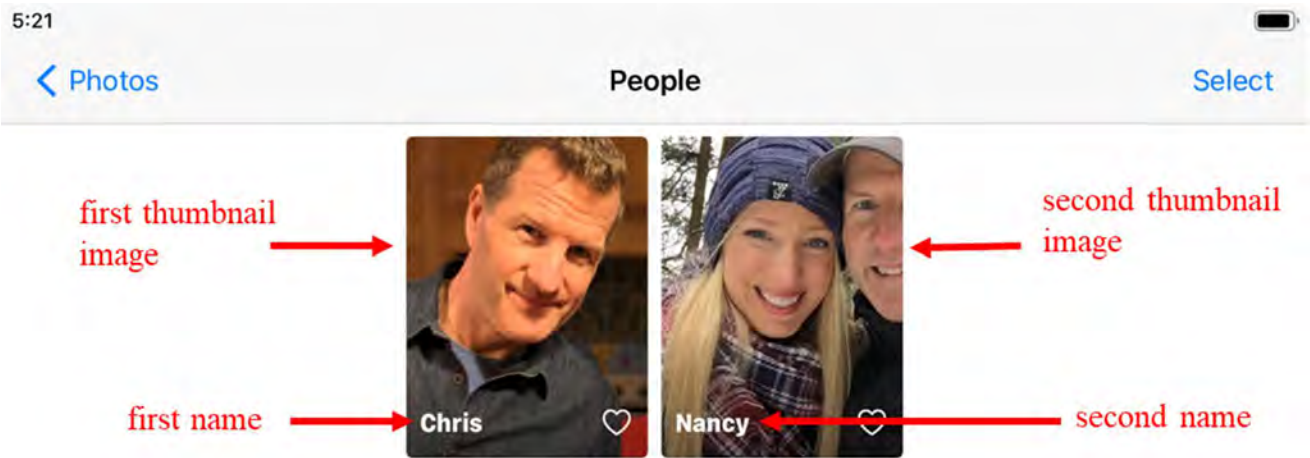
<p>includes a touch or click of the first thumbnail image associated with the first person.</p>	
<p><b>29.</b> The method of claim 1, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.</p>	<p>The input that is indicative of the selection 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>

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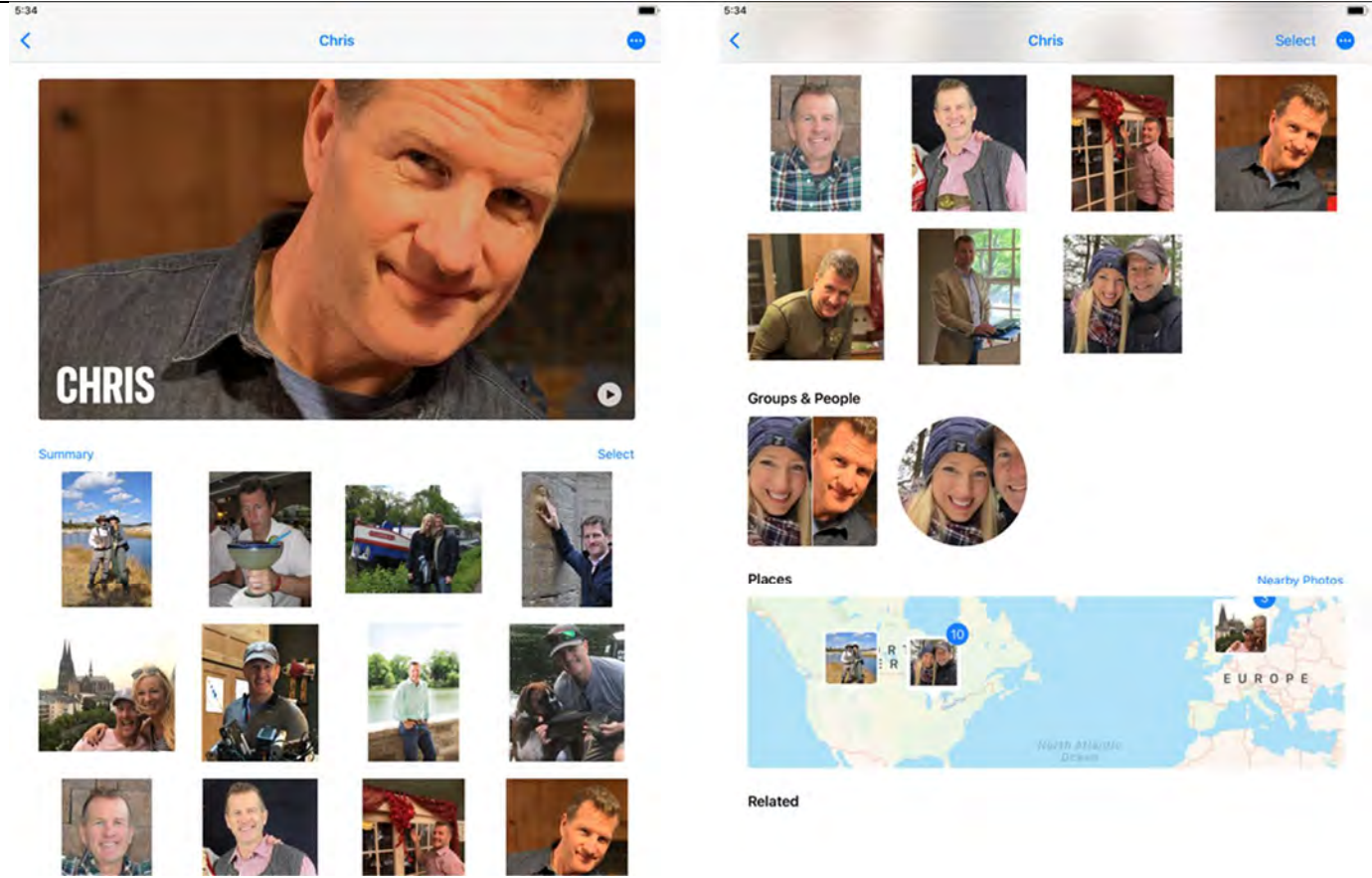
<p>geographic map and</p>	
<p><b>30[b]</b> each of the digital files in the second set of digital files displayed on the interface responsive to the</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location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

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<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 a woman and a child. The interface is clean and minimalist, with no map overlaid on the list.</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>

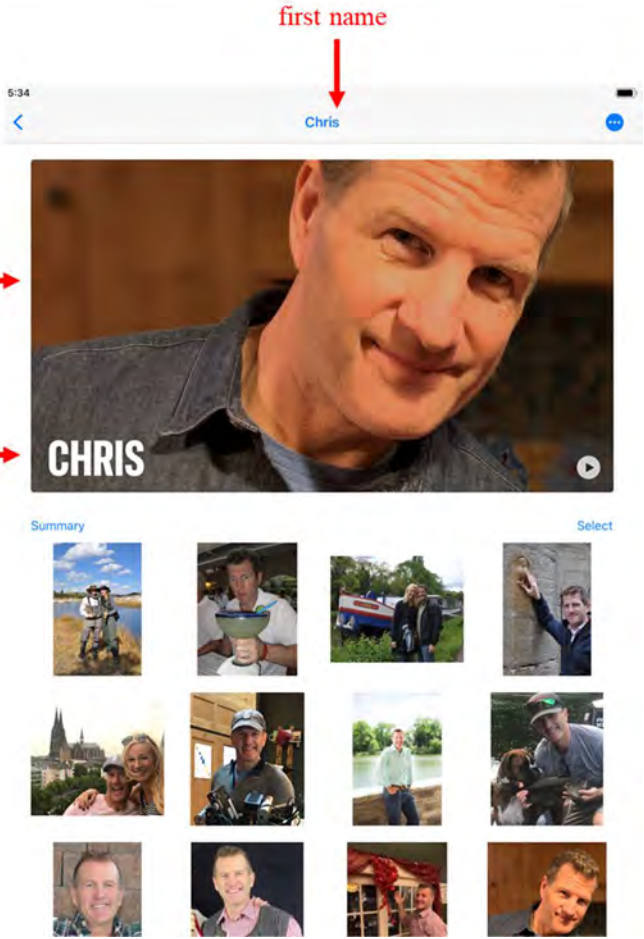
	 <p>The screenshot shows the 'People' view in iPadOS. At the top, there is a status bar with the time '5:21' and a battery icon. Below the status bar is a navigation bar with a back arrow and the word 'Photos' on the left, the word 'People' in the center, and a 'Select' button on the right. The main content 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 portrait 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 edge of the Chris thumbnail. Another red arrow points from the text 'second thumbnail image' to the right edge of the Nancy thumbnail. A red arrow points from the text 'first name' to the name 'Chris' below the first thumbnail. A 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>

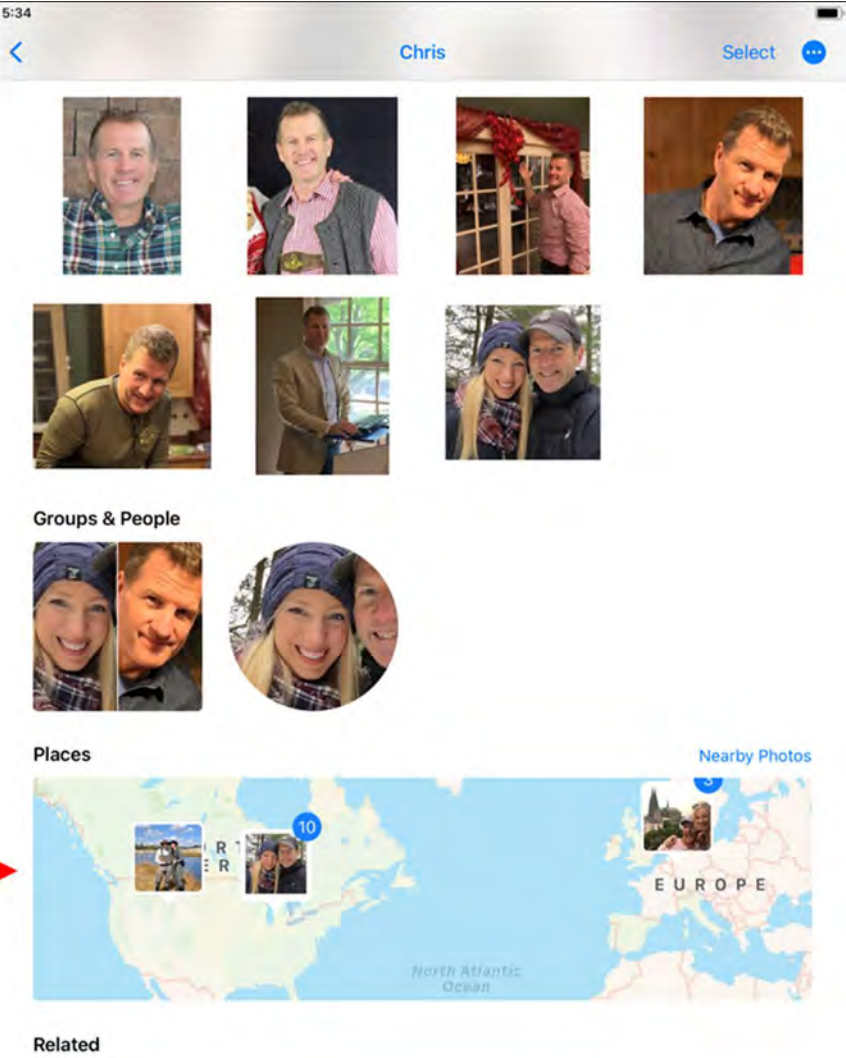
selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:



**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.

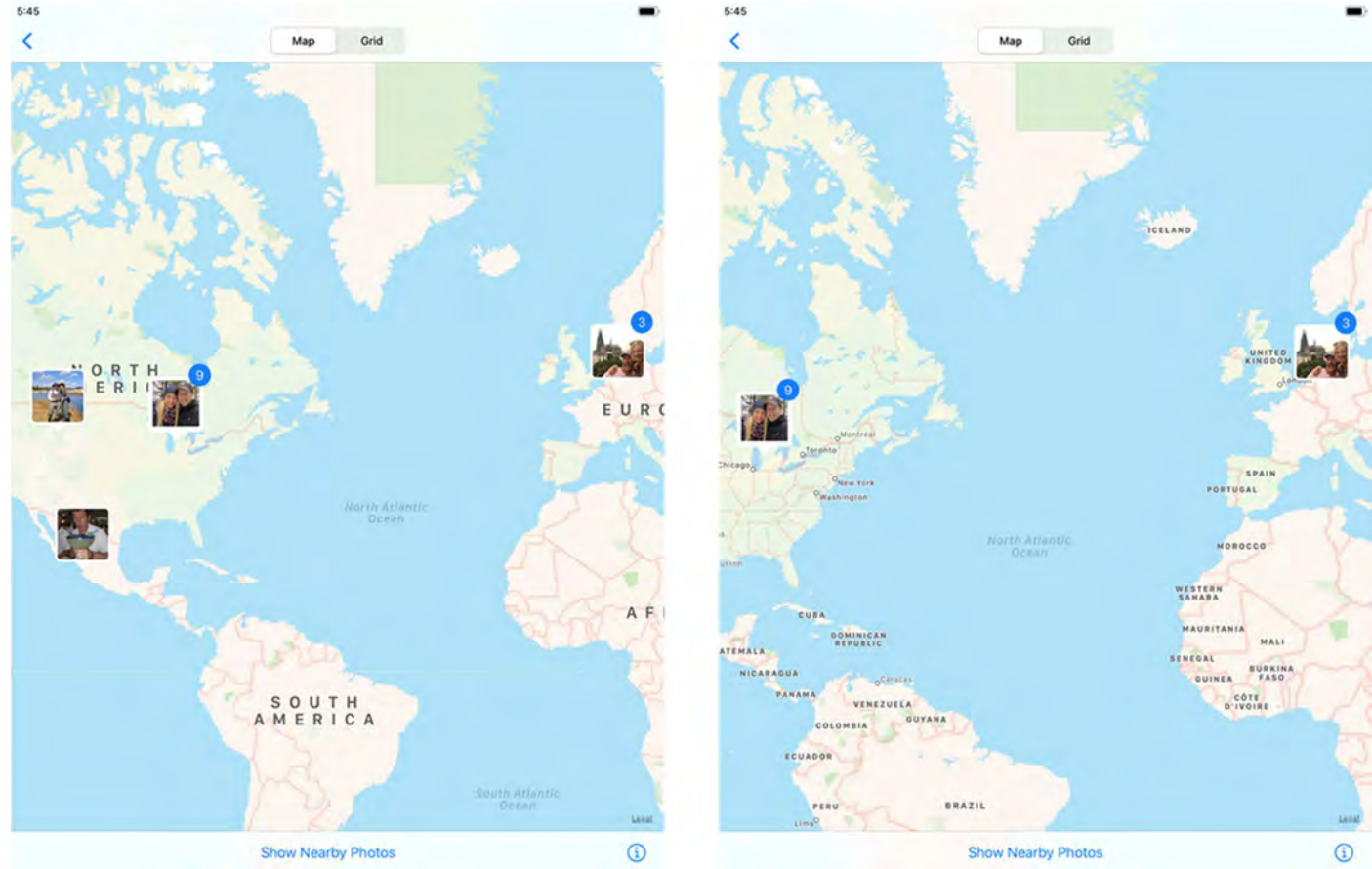
	 <p>The screenshot shows a contact card for 'Chris' on an iPadOS interface. At the top, the name 'Chris' is displayed in blue text, with a red arrow pointing to it from the label 'first name' above. Below the name is a large profile picture of a man, with a red arrow pointing to it from the label 'first 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>

	 <p>5:34</p> <p>&lt; Chris Select</p> <p>Groups &amp; People</p> <p>Places</p> <p>Nearby Photos</p> <p>Related</p> <p>first map image →</p>
<p><b>31[c]</b> responsive to an input that is</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), iPadOS causes a first location view to be displayed on the</p>



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:

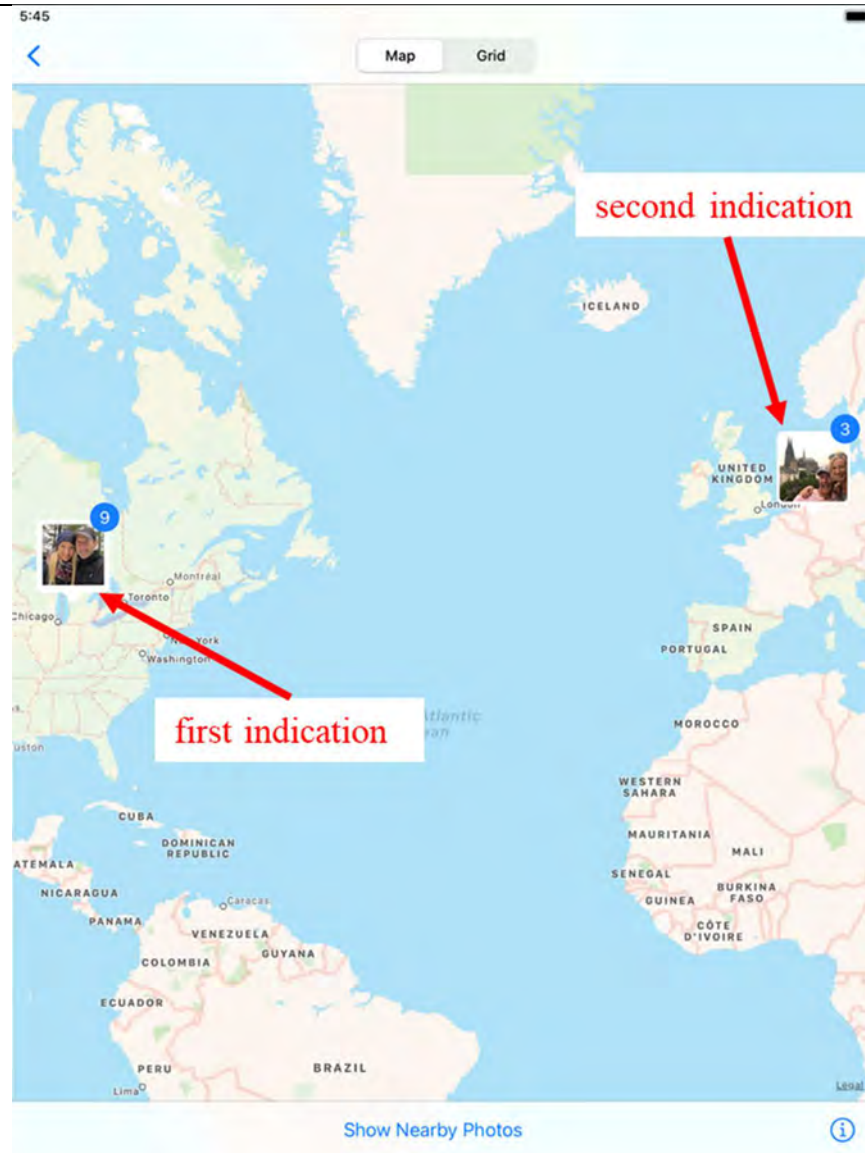
interface. The first location view includes an interactive geographic map. The geographic is interactive in that iPadOS can zoom in or out, or move side to side.

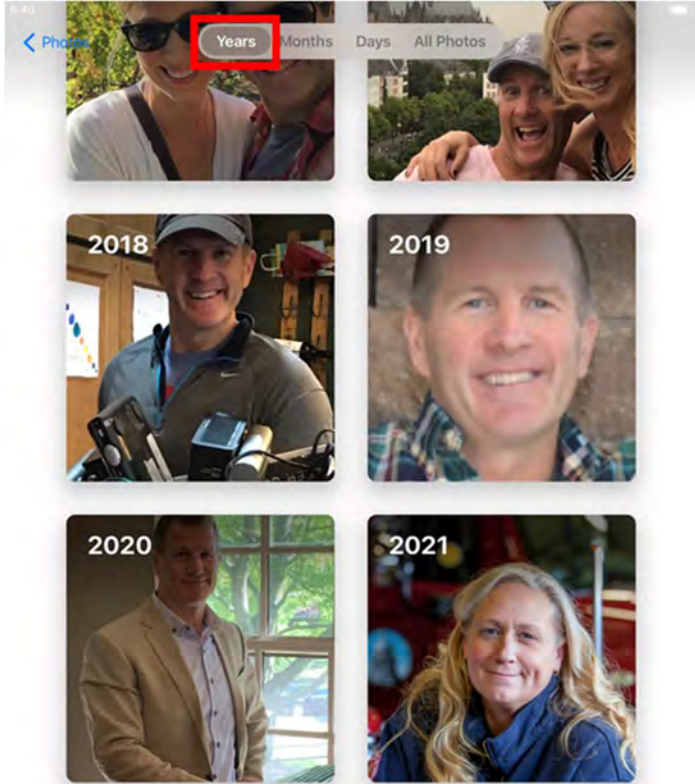


**31[c][i]** an interactive geographic map, **31[c][ii]** a first indication

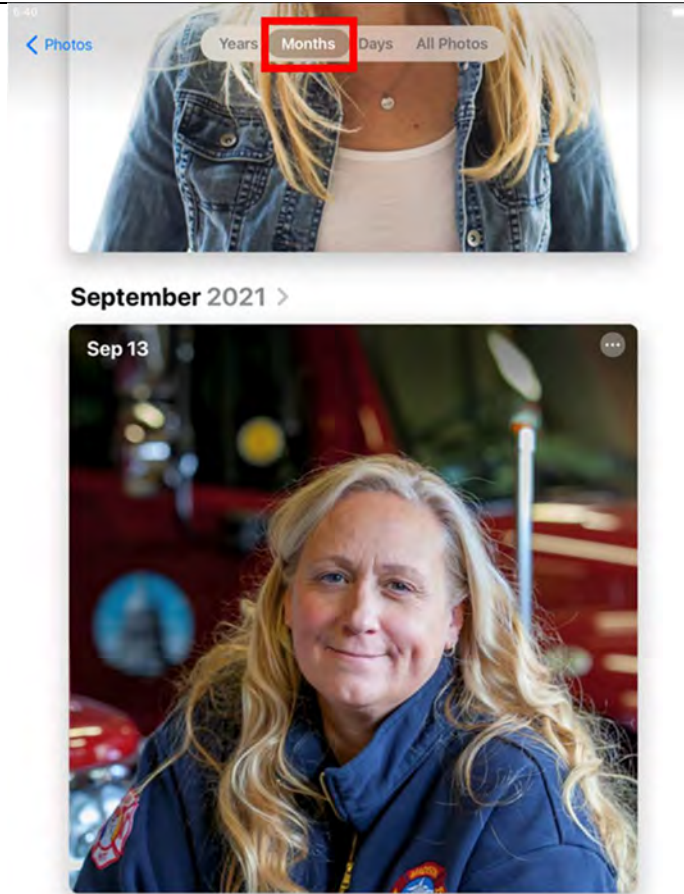
The first location view includes a first indication positioned at a first location on the interactive geographic map and a second indication positioned at a second location on the interactive geographic map.

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 more photo thumbnails. For example, 2018 has two photos, 2019 has one, 2020 has one, and 2021 has one.</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.

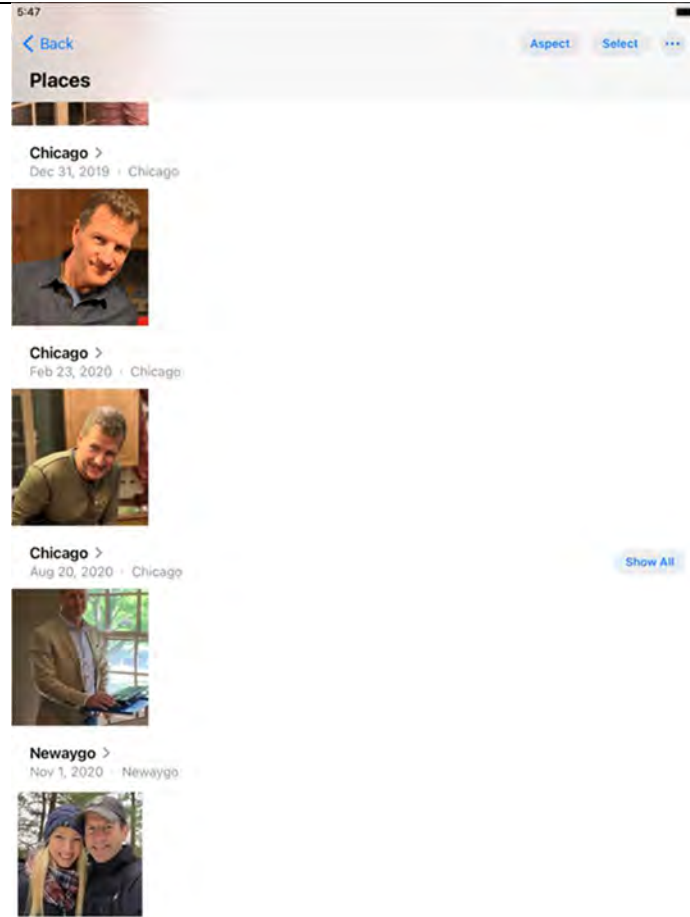
<p>files to be displayed on the interface.</p>	
<p><b>32.</b> The method of claim 31, wherein the first digital file is included in the plurality of digital files.</p>	<p>The first digital file (<i>see</i> limitation 31[b][i]) is included in the plurality of digital files that are grouped by year, month,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

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<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>

<p>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>	
<p><b>34.</b> The method of claim 31, wherein the first indication is associated with a first set of digital files and the first</p>	<p>The first indication is associated with a first set of digital files and the first location. For example, iPadOS causes the view below to be displayed responsive to a touch/tap of the first indication.</p>

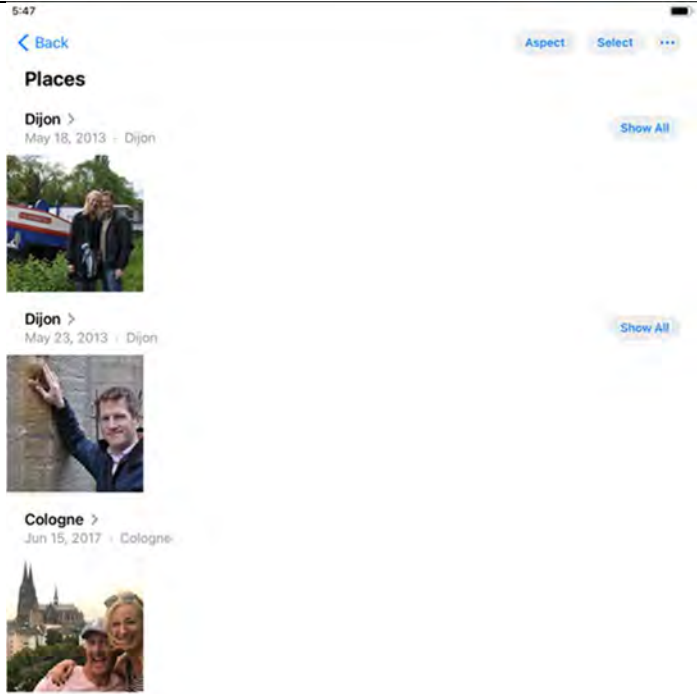
location, and the second indication is associated with a second set of digital files and the second location.



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.

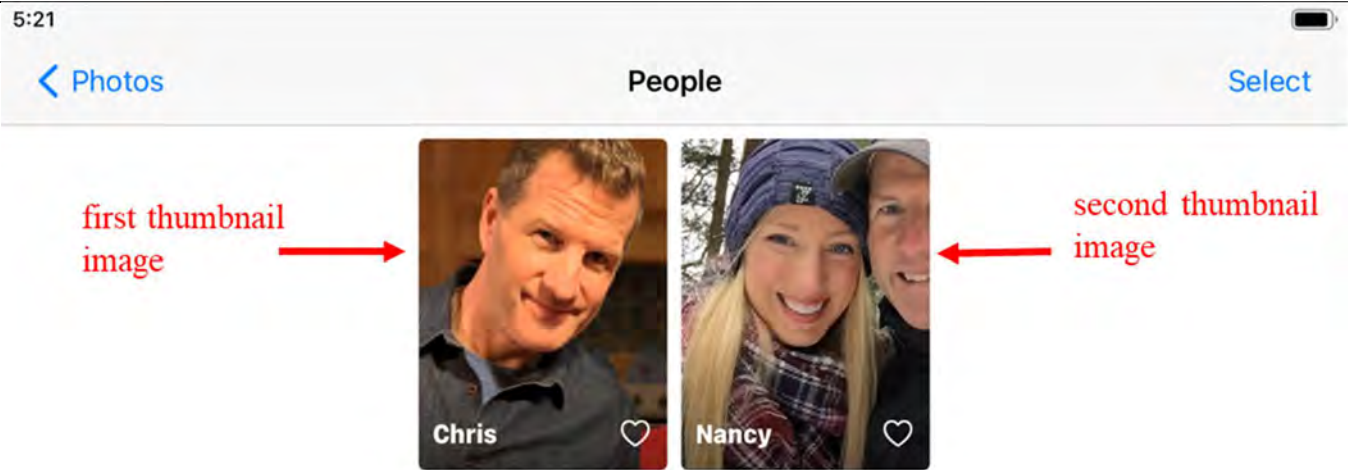
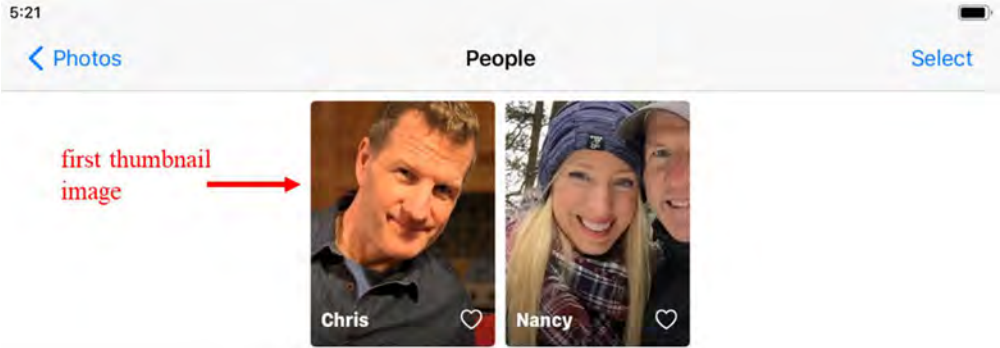


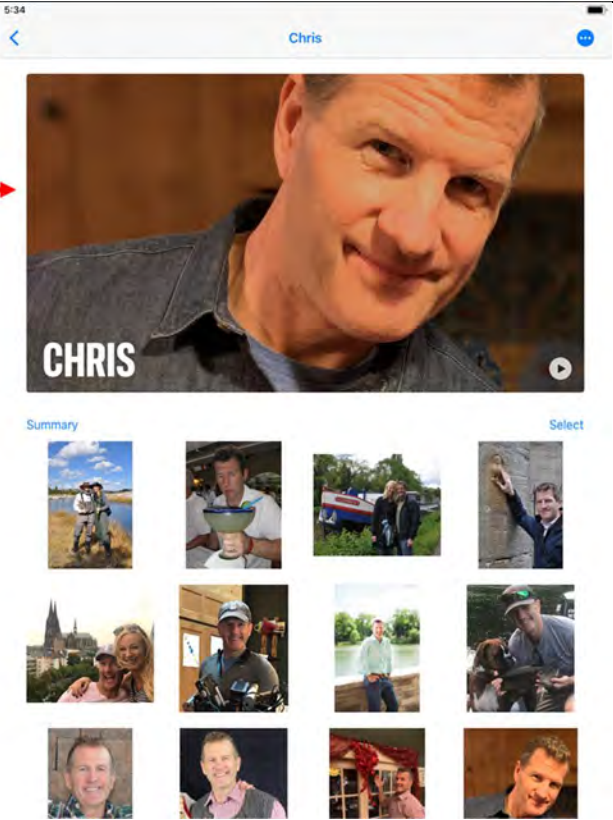
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	 <p>The screenshot shows an iPadOS interface for a 'Places' gallery. At the top, there is a 'Back' button and 'Aspect', 'Select', and a three-dot menu icon. The main content is a list of photo albums. The first album is titled 'Dijon' with a right-pointing 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>

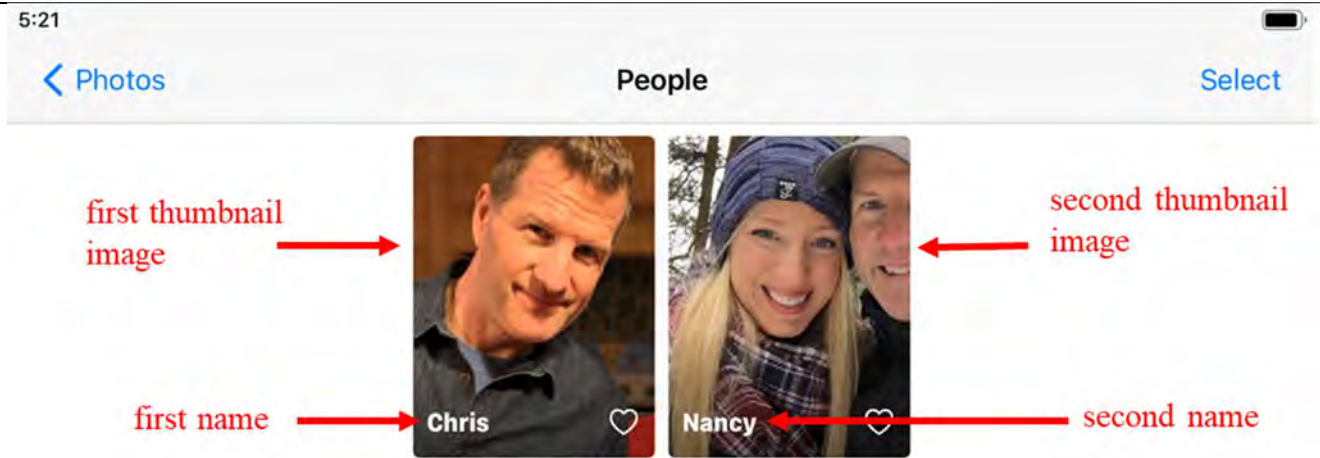
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<p><b>36.</b> The method of claim 35, wherein the first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at</p>	<p>The first thumbnail image includes at least a portion of a face of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

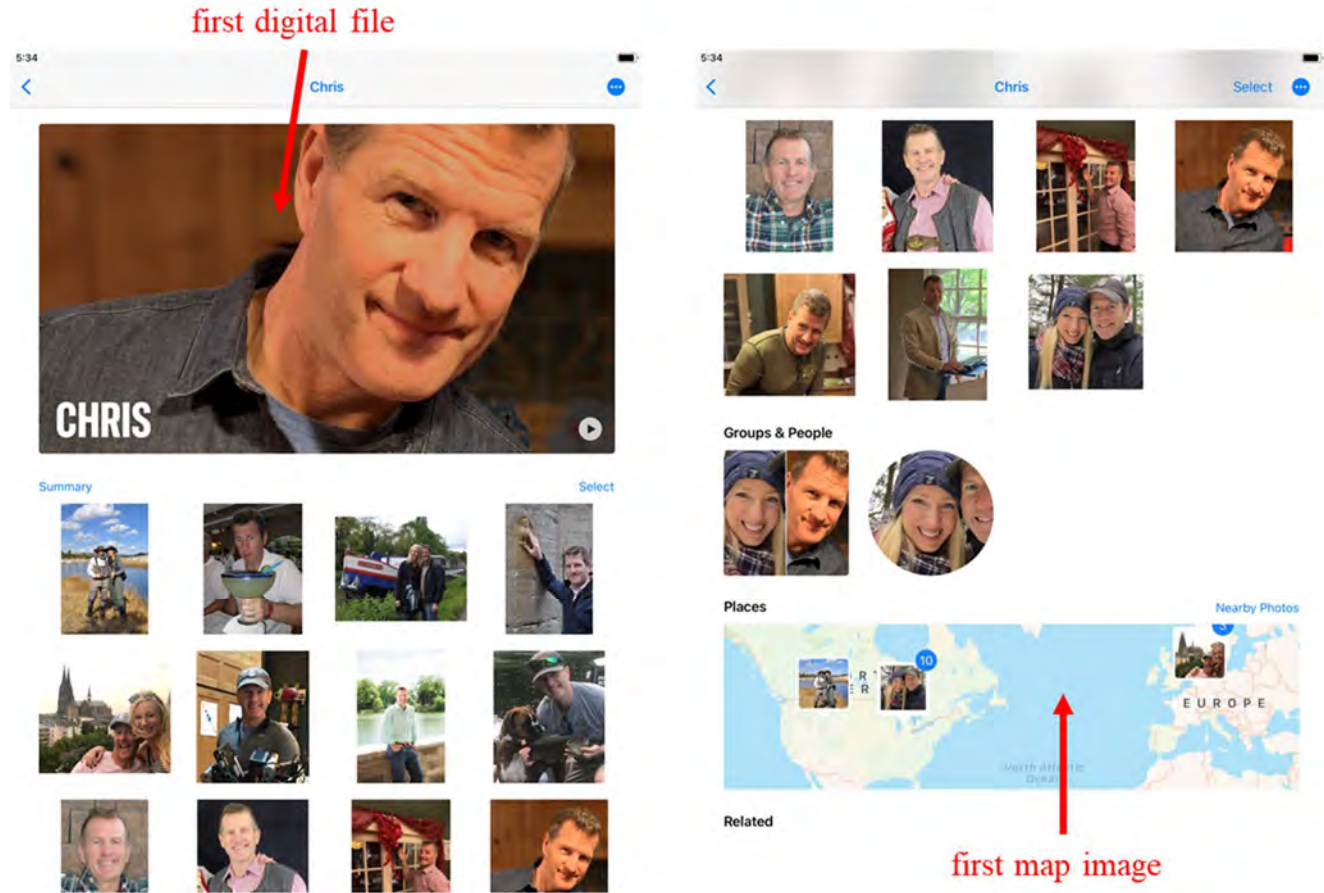


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

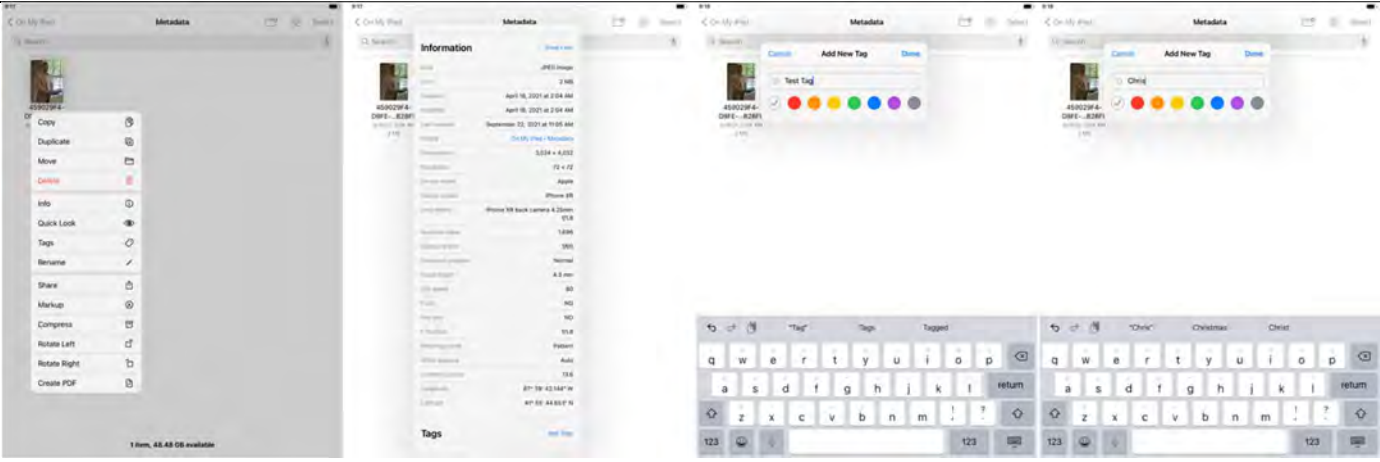


**40[pre]** The method of claim 31, further comprising,

See information for claim 31.

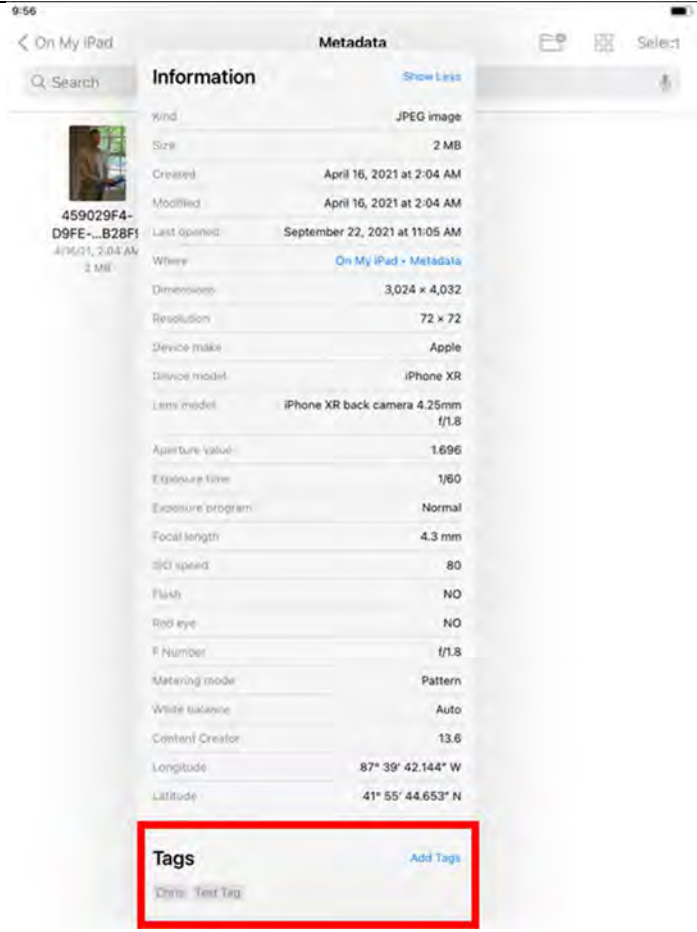
<p><b>40[a]</b> prior to the causing the interface to display the people view: causing the first digital file to be displayed on the interface;</p>	<p>Prior to the causing the interface to display the people view, iPadOS causes the first digital file to be displayed on the interface.</p>  <p>The image 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 tabs 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 one of the thumbnails in the lower-middle section of the grid, which shows a man in a brown jacket. Other thumbnails include various scenes, people, and objects.</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>

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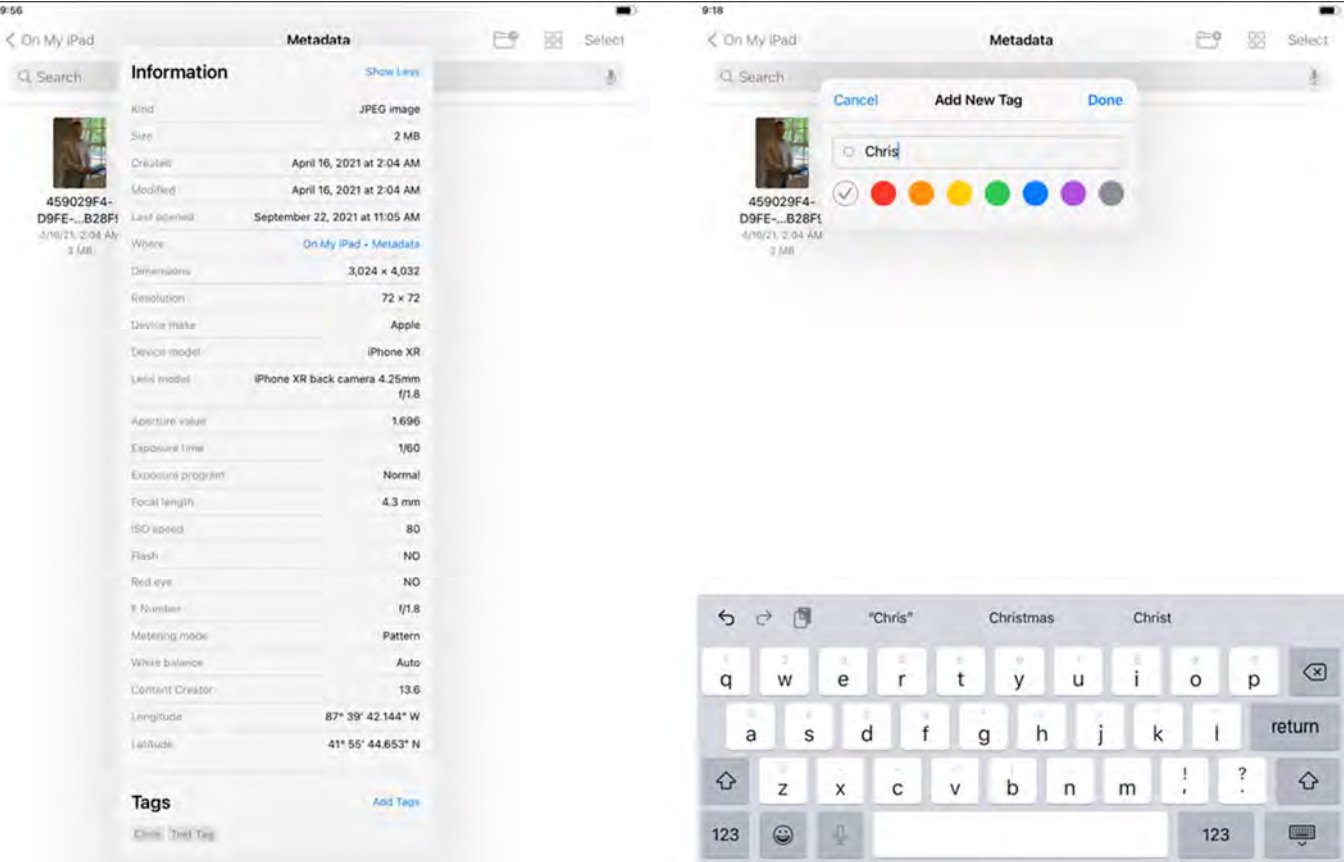
	 <p>The image displays four sequential screenshots of the iPadOS Metadata interface. The first screenshot shows a file with a context menu open, listing actions such as Copy, Duplicate, Move, Delete, Info, Quick Lock, Tags, Rename, Share, Markup, Compress, Rotate Left, Rotate Right, and Create PDF. The second screenshot shows the 'Information' screen for the file, displaying details like name, creation and modification dates, location, and device information. The third screenshot shows the 'Add New Tag' dialog box with a 'Test Tag' and a row of color-coded tag options. The fourth screenshot shows the 'Add New Tag' dialog box with the tag 'Chris' selected. Below the screenshots are two keyboard overlays: the first shows the 'Tag' keyboard with a 'Tagged' label, and the second shows the 'Chris' keyboard with a 'Christmas' label.</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>



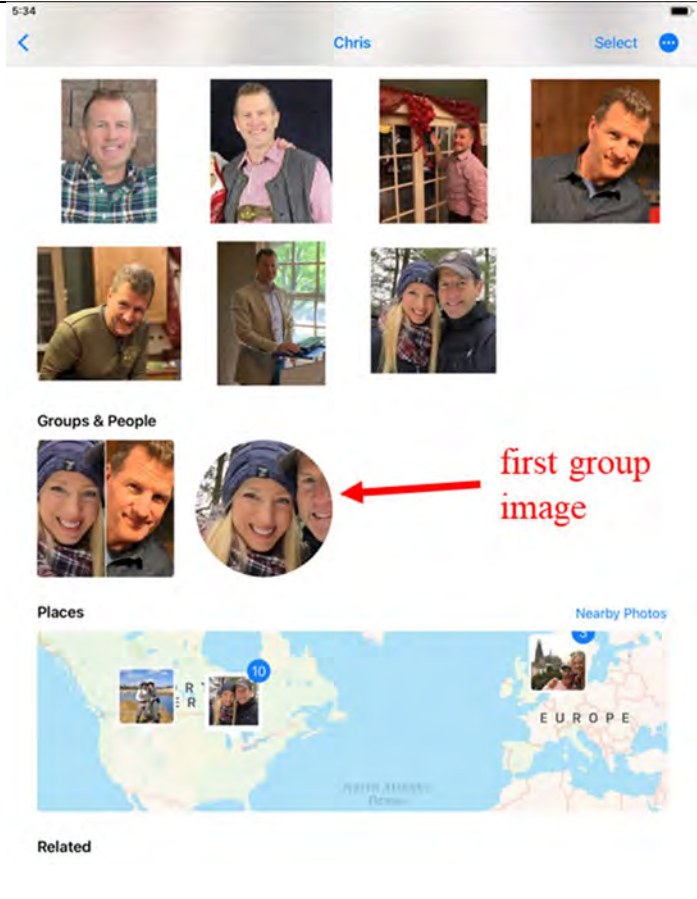
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

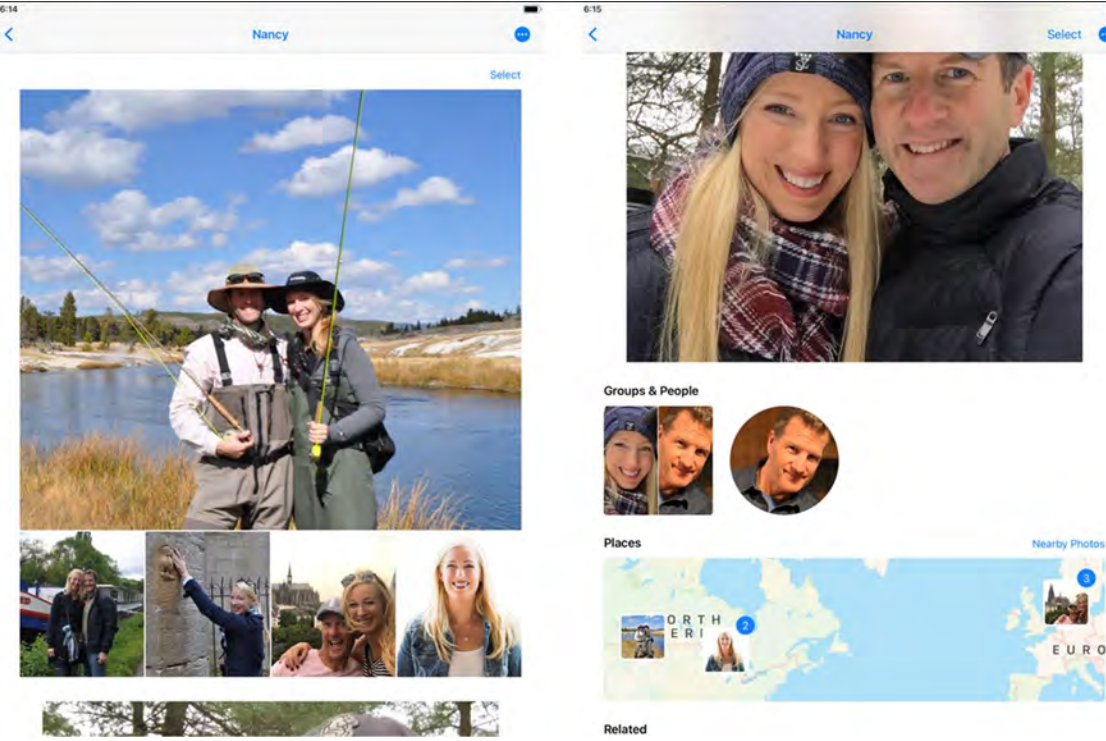
	
<p><b>41.</b> The method of claim 40, wherein the first user-generated tag includes the name of the first person.</p>	<p>The first user-generated tag can include the name of the first person.</p>

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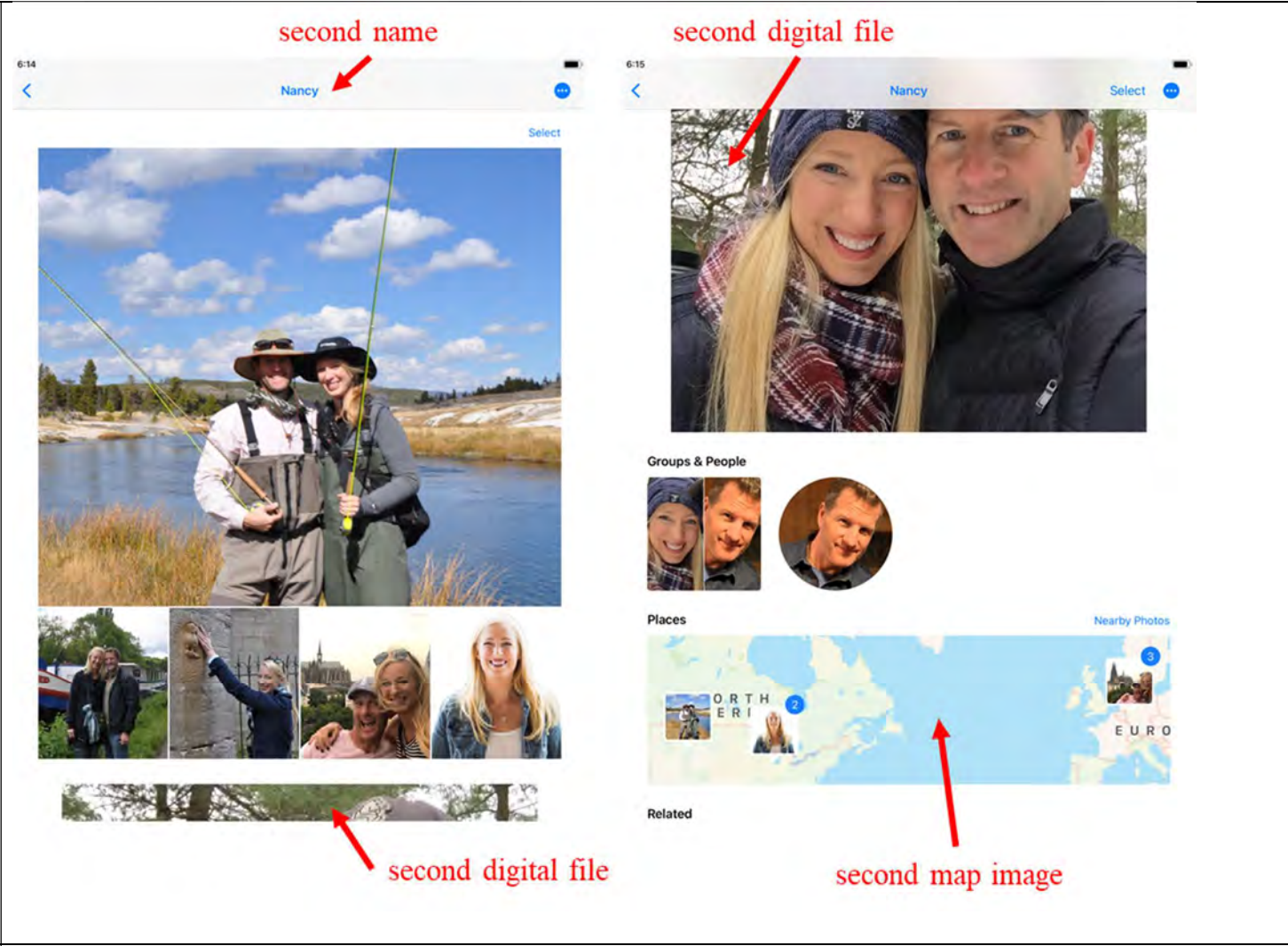
	
<p><b>42.</b> The method of claim 41, further comprising exporting the first digital file to a remote device, the exported first digital file</p>	<p>iPadOS exports the first digital file to a remote device, and the exported first digital file includes information associated with the first user-generated 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 status bar 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>

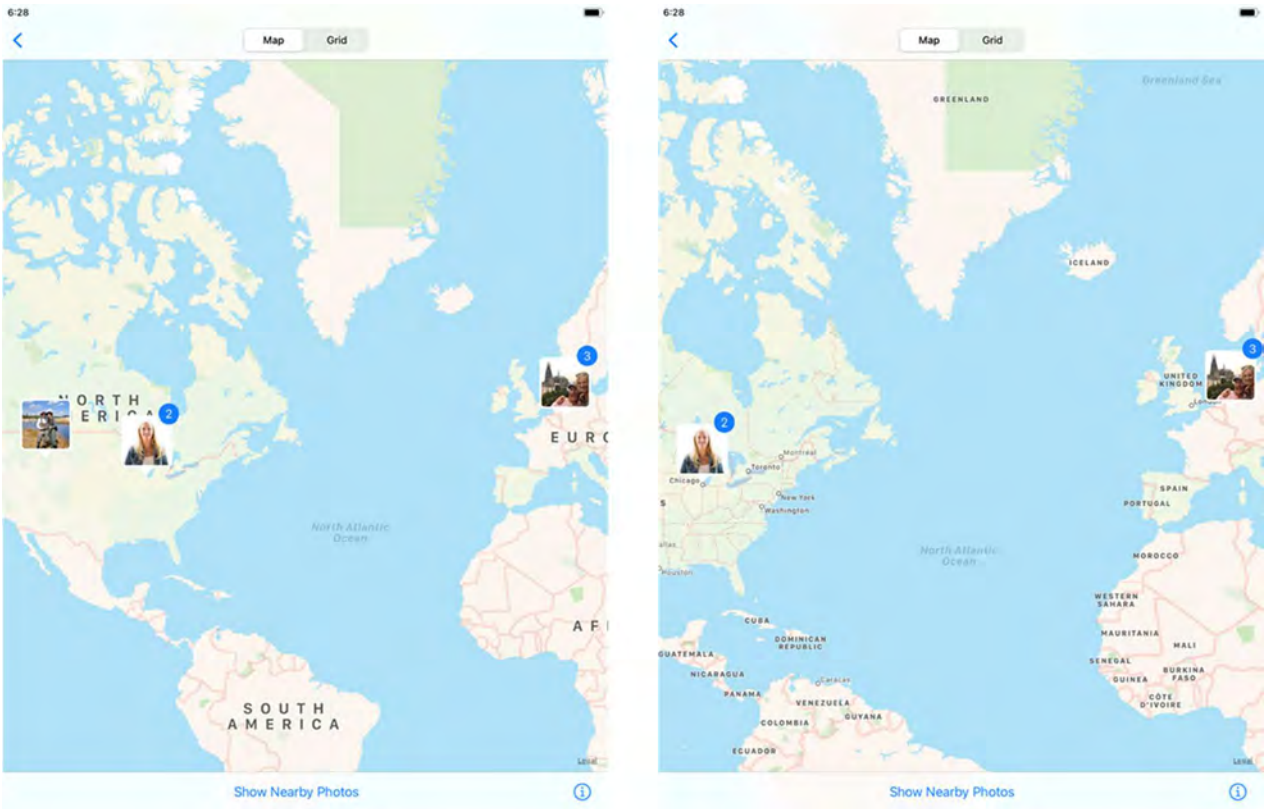
<p>group view including one or more digital files associated with another person that is associated with the first person.</p>	
<p><b>44.</b> The method of claim 43, wherein the another person is the second person.</p>	<p>The another person is the second person. <i>See</i> information for limitations 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>

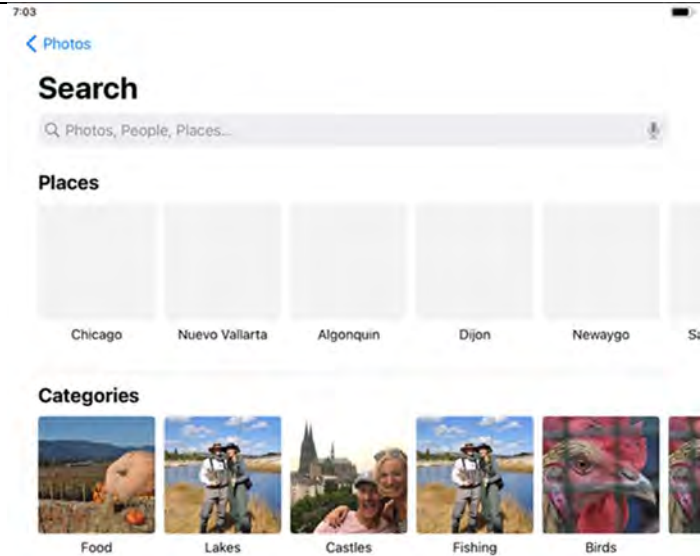


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<p>digital files and the fourth location.</p>	<div data-bbox="835 191 1522 682" data-label="Image"> </div> <p>The fourth indication is associated with a fourth set of digital files and the fourth location. For example, iPadOS displays the view below 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>

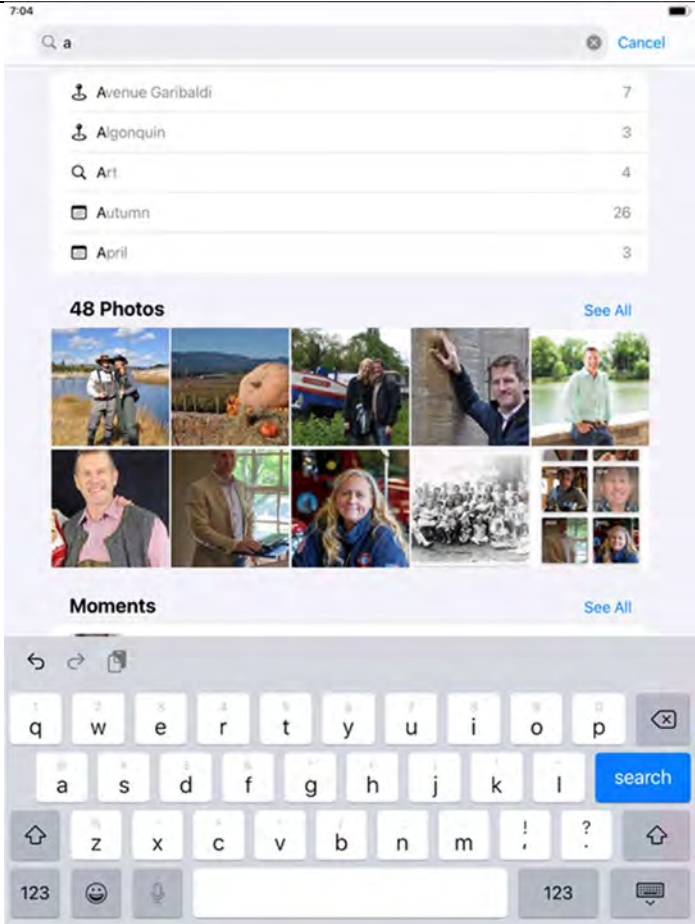
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - iPadOS

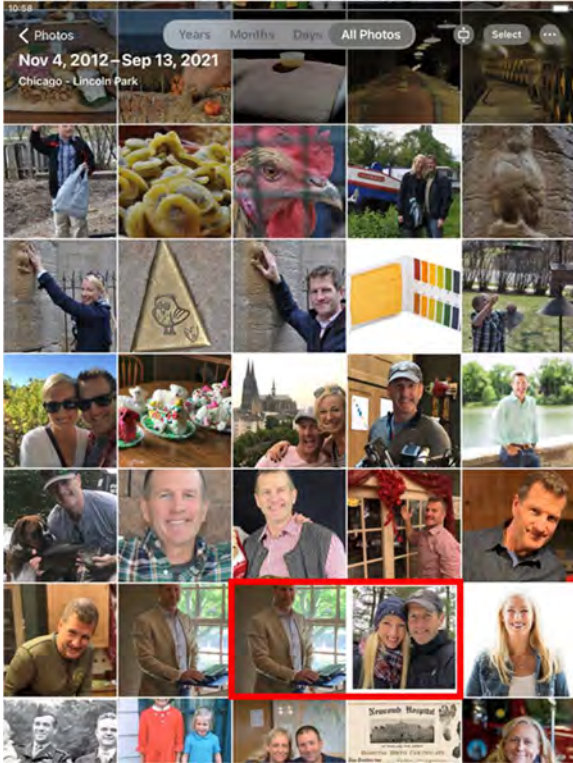
<p><b>49.</b> The method of claim 31, further comprising receiving one or more filtering criteria and causing one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria.</p>	<p>iPadOS receives one or more filtering criteria and causing one 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>



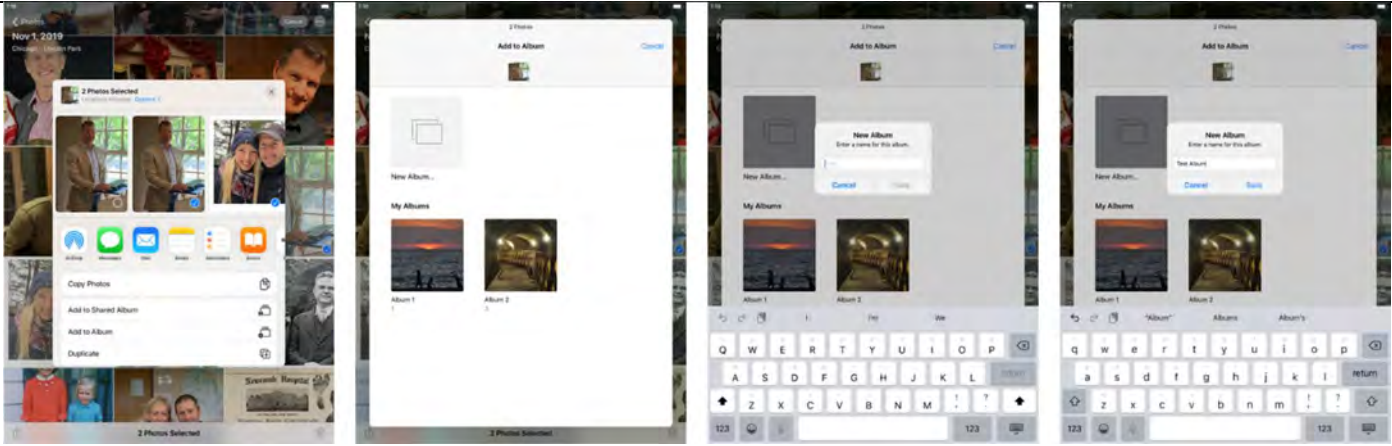
Further, iPadOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing just the letter “a” as a filtering criterion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

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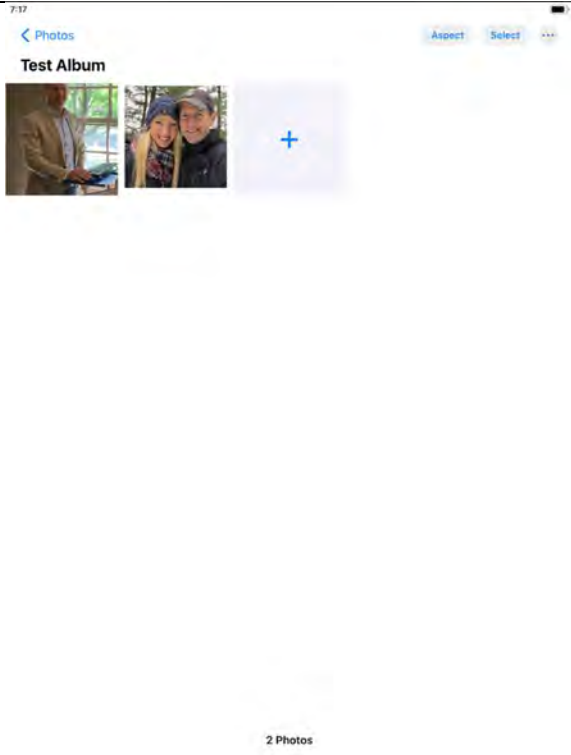
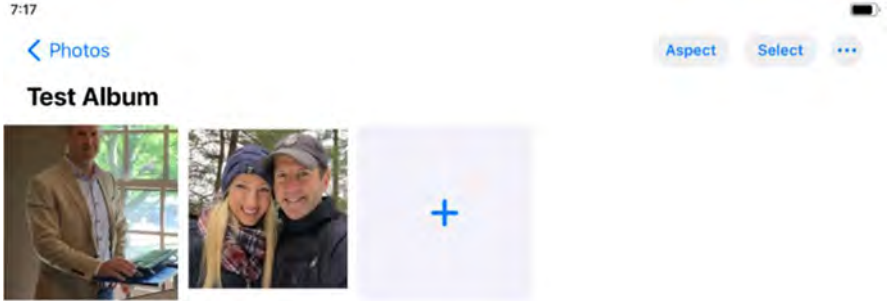
	 <p>The screenshot shows the iPadOS search interface with the letter 'a' entered. The results are categorized into locations (Avenue Garibaldi with 7 results, Algonquin with 3), categories (Art with 4, Autumn with 26, April with 3), 48 photos, and Moments. A keyboard is visible at the bottom.</p> <p>The 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>

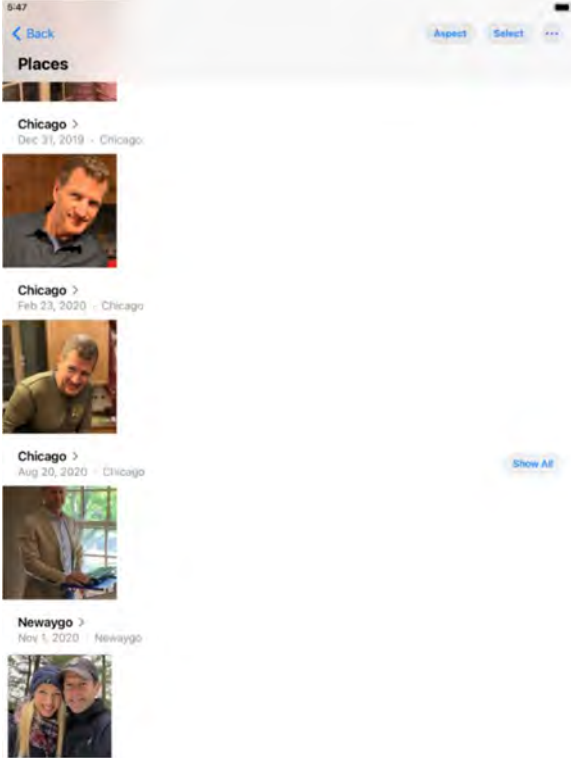
<p><b>50[a]</b> causing a second plurality of images to be displayed on the interface;</p>	<p>iPadOS causes a plurality of images to be displayed on the interface.</p> 
<p><b>50[b]</b> receiving alphanumeric text as the album name;</p>	<p>iPadOS receives alphanumeric text as the album name. For example, 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>

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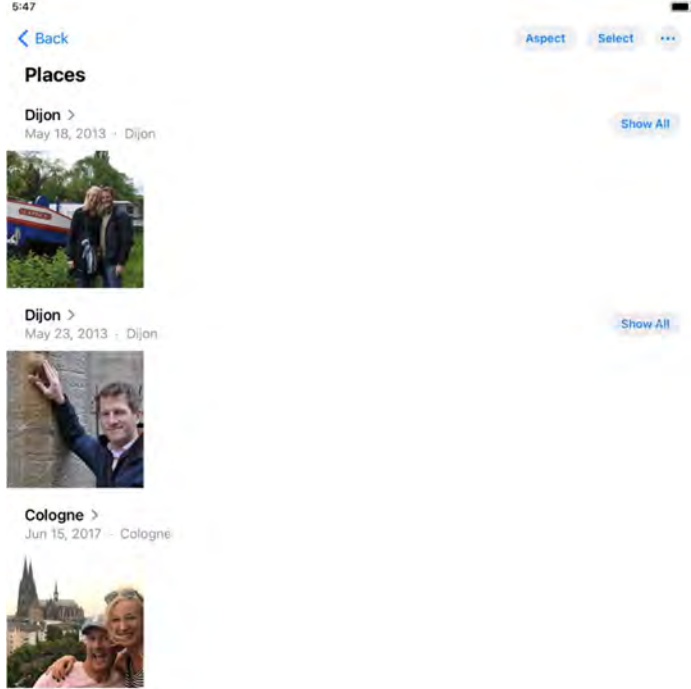
	 <p>The figure consists of four sequential screenshots of an iPadOS photo gallery interface. The first screenshot shows a grid of photos with a '2 Photos Selected' overlay and a sharing menu. The second screenshot shows the 'Add to Album' screen with a 'New Album' dialog box. The third screenshot shows 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>

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	 <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, it says '2 Photos'. In the top right corner, there are buttons for '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 interface elements like the back arrow, 'Photos' label, and 'Aspect', 'Select', and menu icons are also present.</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>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 portrait 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 two people. 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>

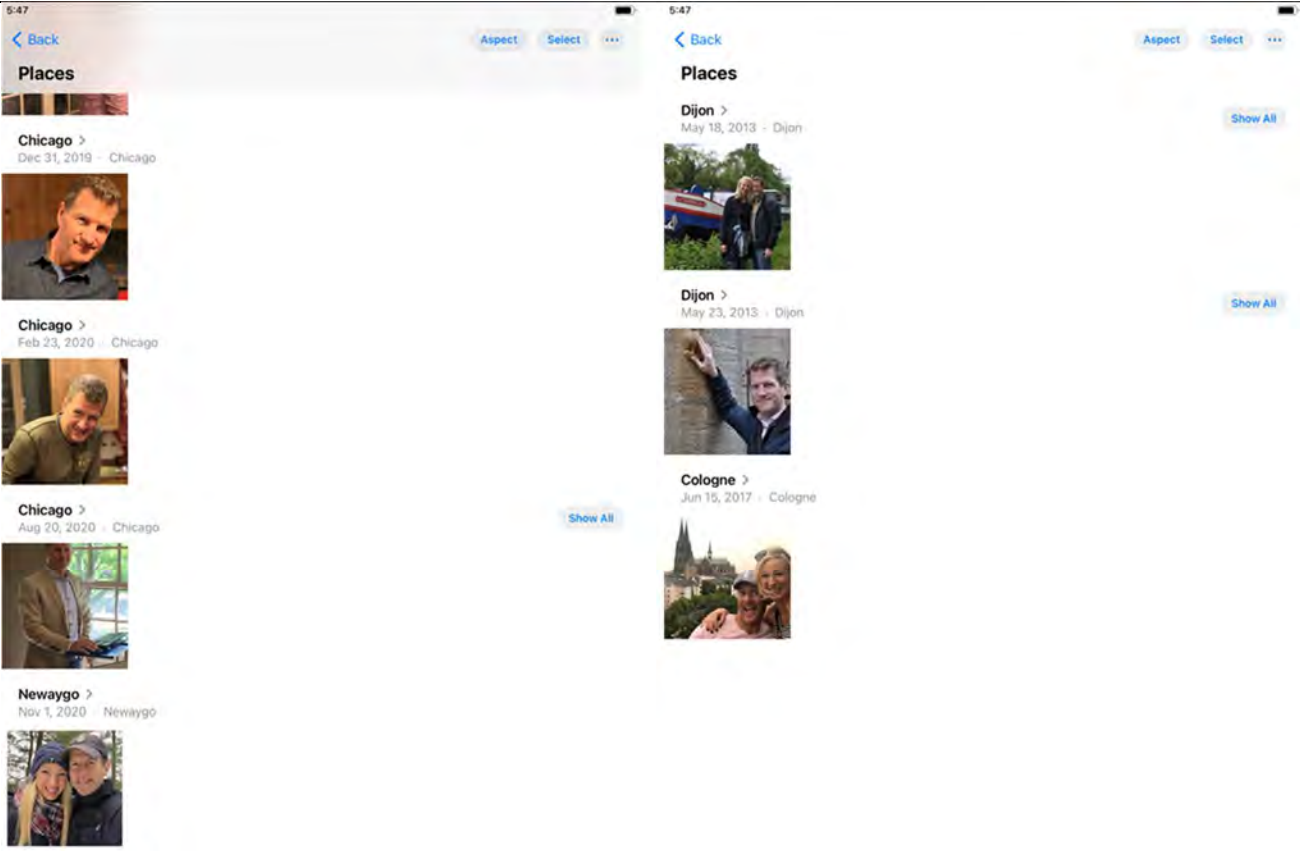
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.

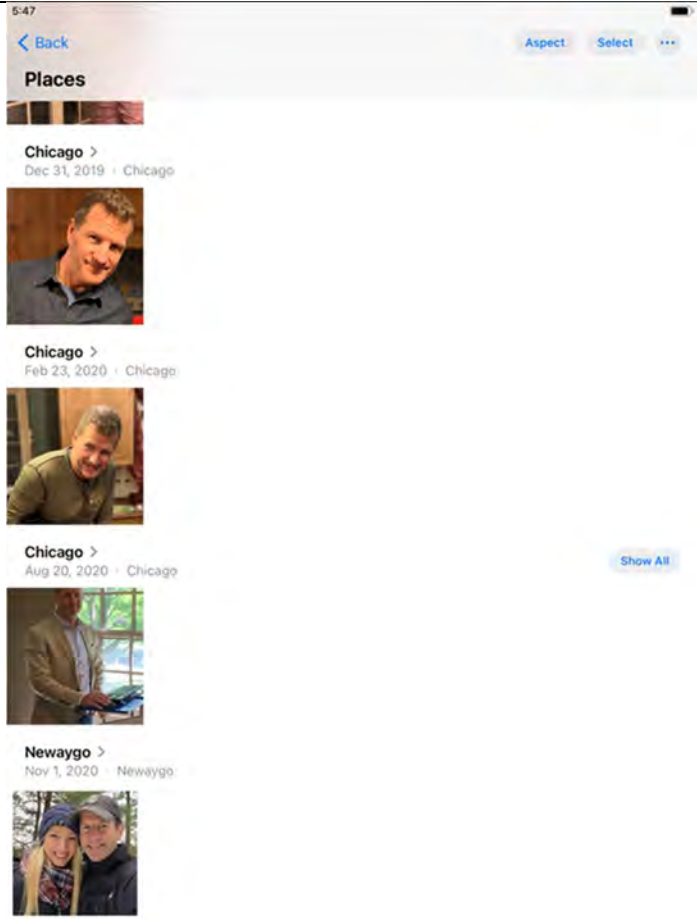


**53.** The method of claim 33, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

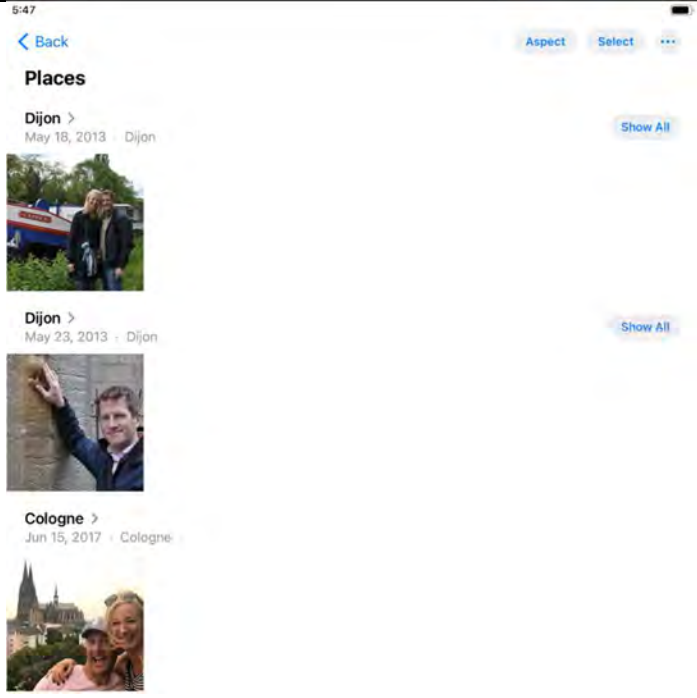
include a photo, a video, or both.

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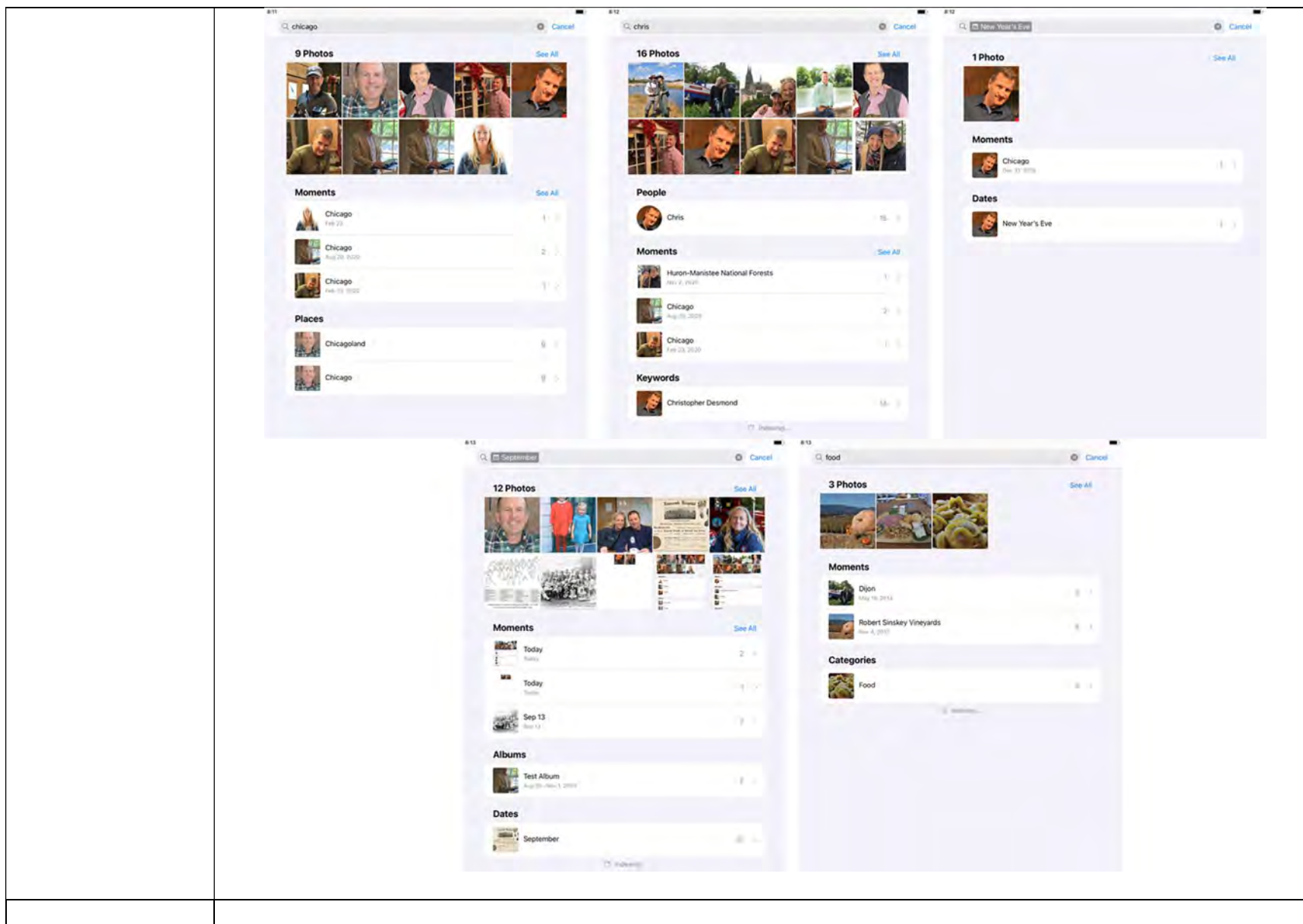
<p>digital files, and the second set of digital files include a photo, a video, or both.</p>	
<p><b>55[pre]</b> The method of claim 51,</p>	<p>See information for claim 51.</p>
<p><b>55[a]</b> wherein the first set of digital files displayed on the interface responsive to the</p>	<p>The first set of 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>The screenshot shows an iPadOS interface with a 'Places' section. It lists three locations: Chicago (Dec 31, 2019), Chicago (Feb 23, 2020), and Chicago (Aug 20, 2020). Each location is accompanied by a photo of a man. Below these is a 'Newwaygo' location (Nov 1, 2020) with a photo of a man and a woman. A 'Show All' button is visible on the right side of the list.</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>

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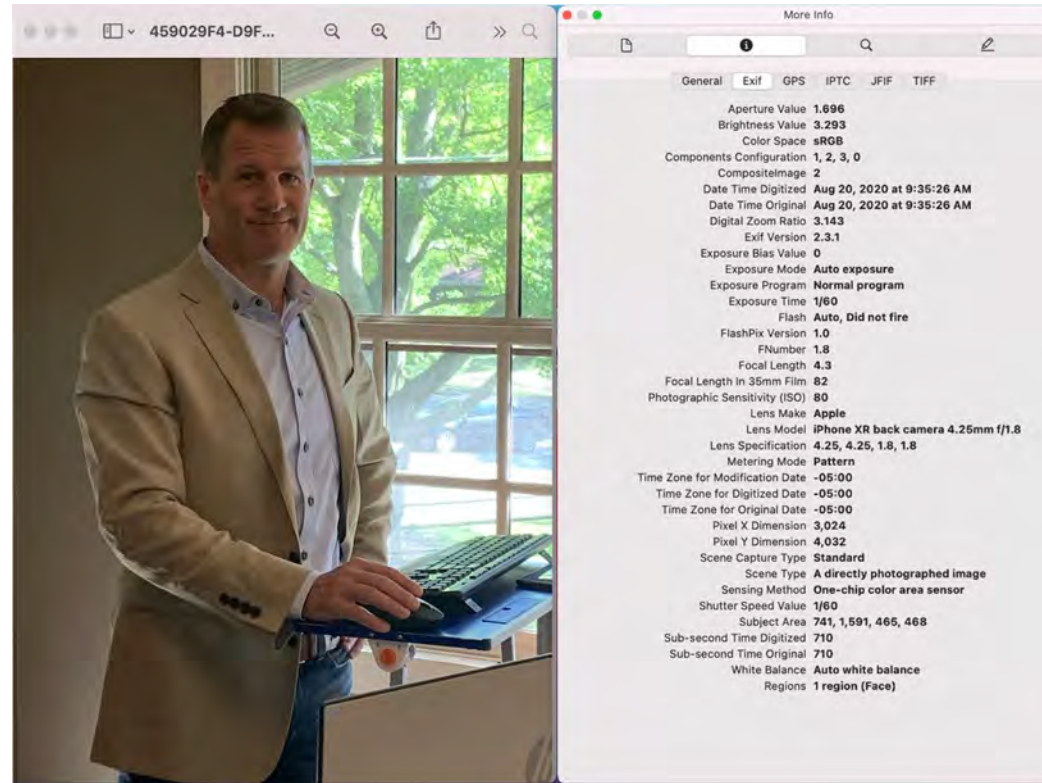
<p>second location are not overlaid on the interactive geographic map.</p>	 <p>The screenshot shows an iPadOS interface with a 'Places' section. It lists three entries: 'Dijon' (May 18, 2013), 'Dijon' (May 23, 2013), and 'Cologne' (Jun 15, 2017). Each entry includes a small photo and a 'Show All' button. The interface includes a 'Back' button, 'Aspect' and 'Select' options, and a status bar at the top showing the time 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>

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**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].

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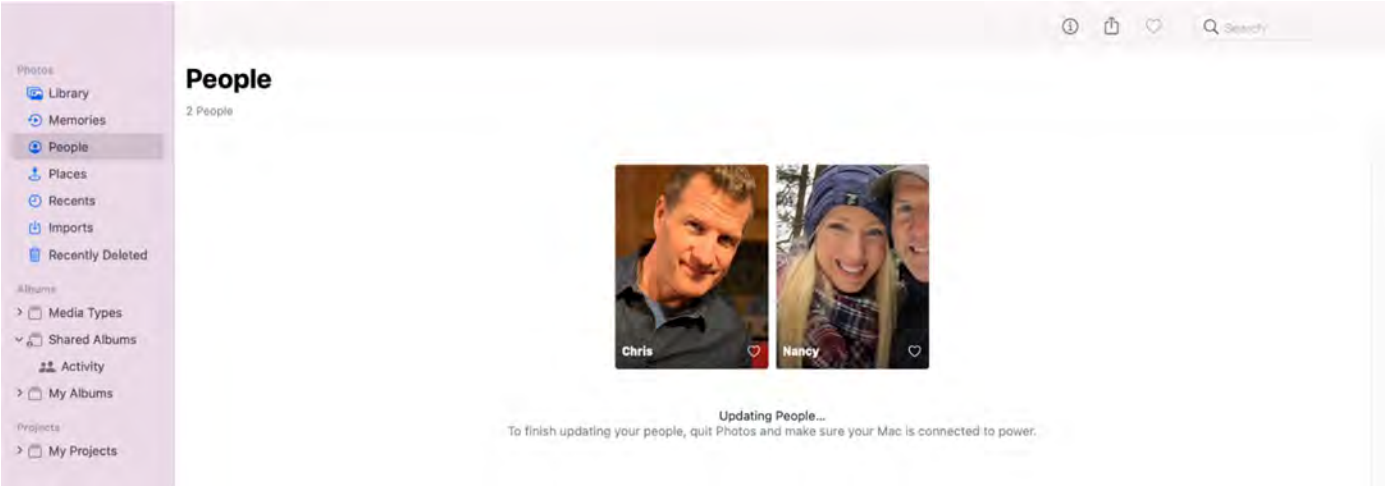
includes a touch or click of the first thumbnail image associated with the first person.	
<b>59.</b> The method of claim 31, wherein the input that is indicative of the selection of the first map image is a touch or click of the first map image.	The input that is indicative of the selection of the first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

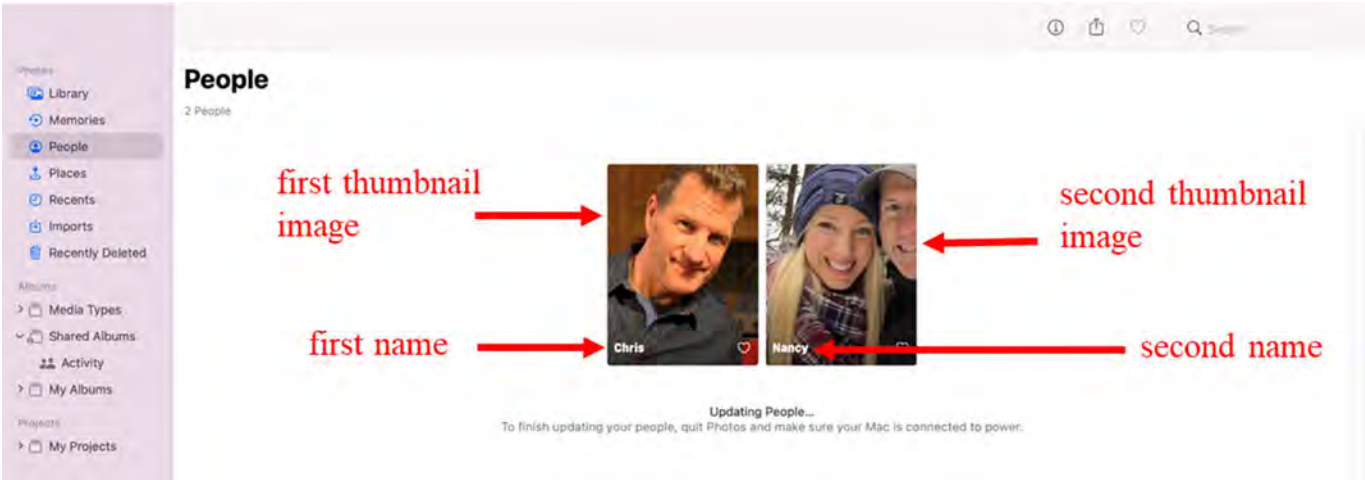


# **Exhibit D.3**

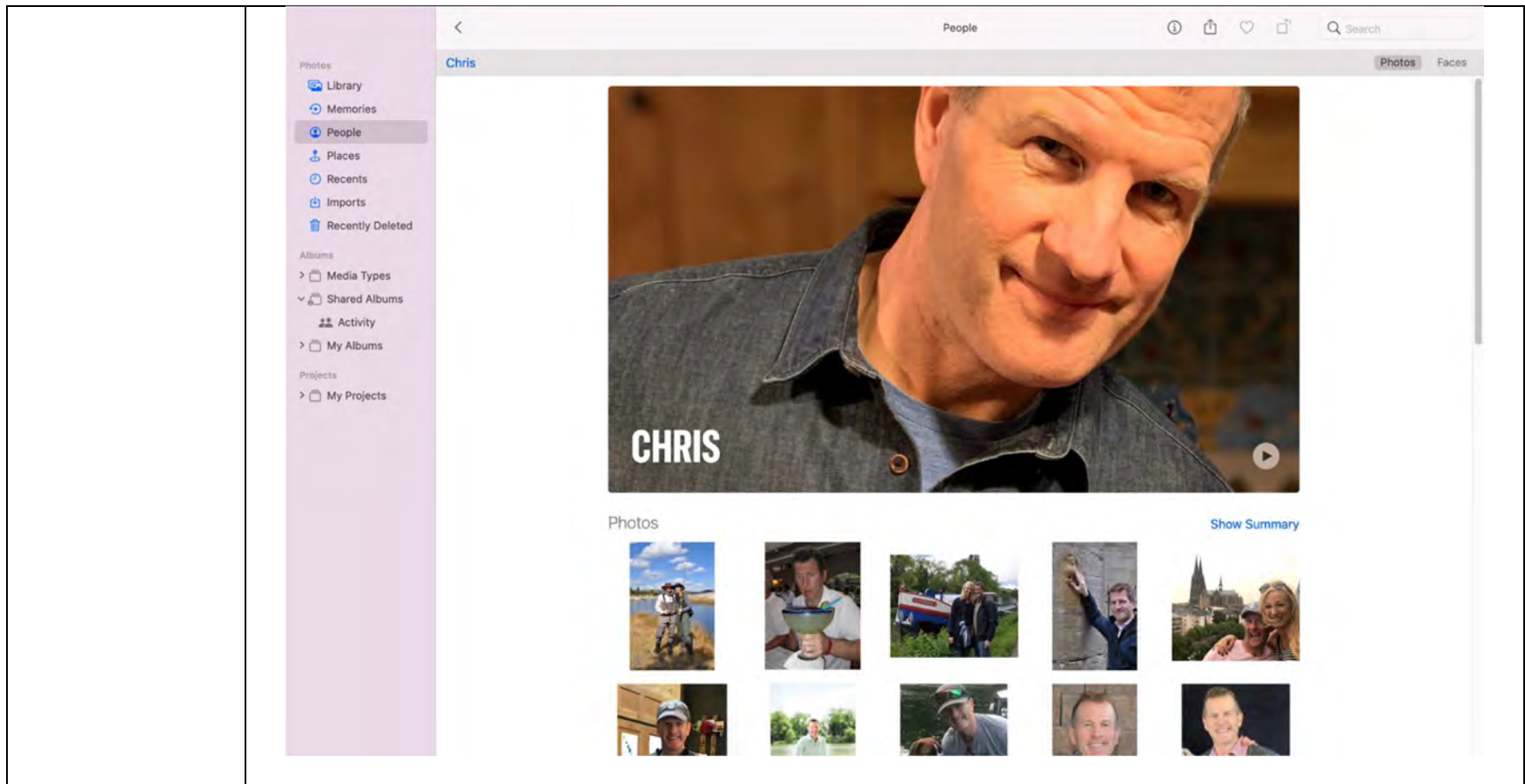
**U.S. Patent No. 11,017,020 – Infringement Claim Chart**

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.

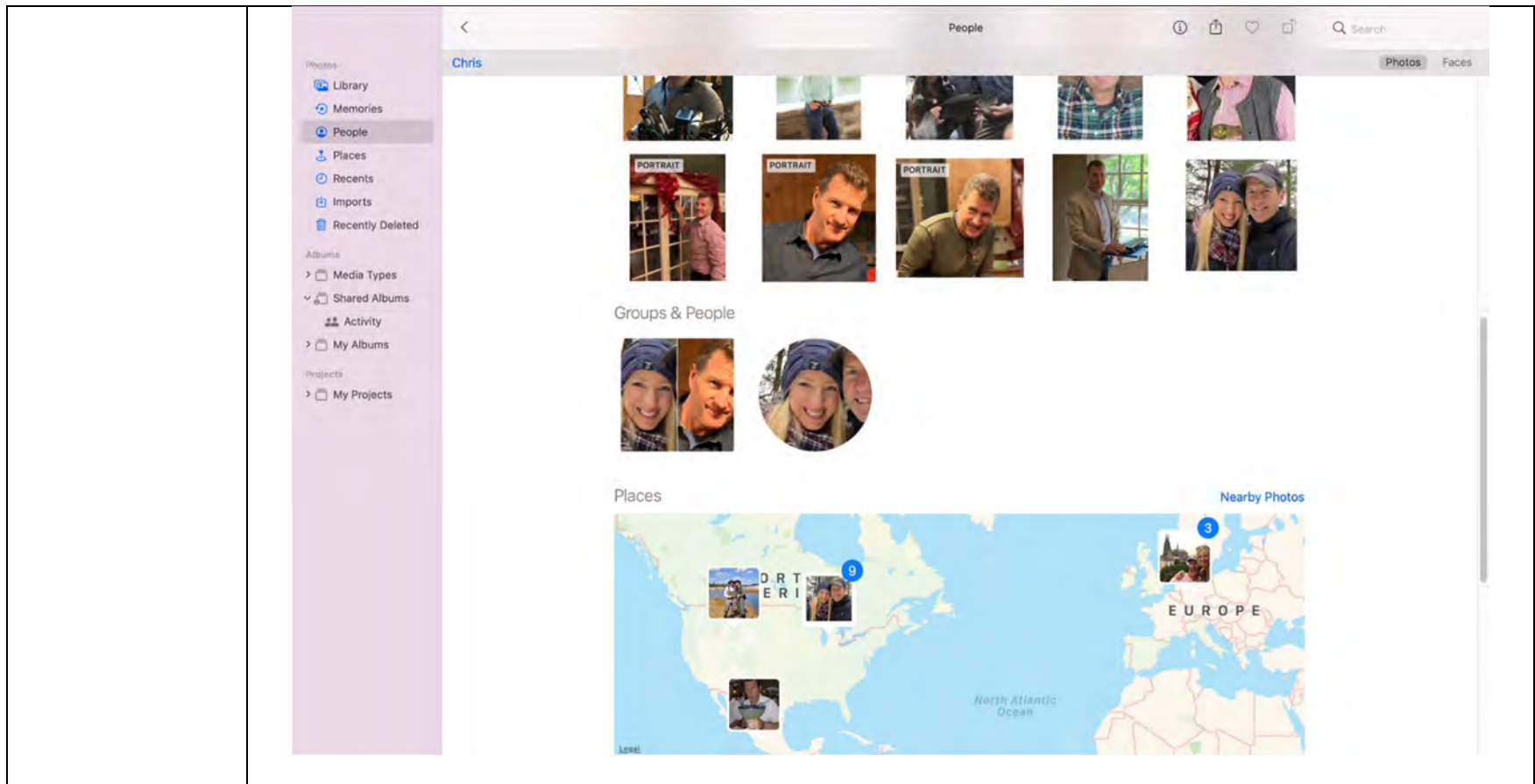
CLAIM ELEMENT	APPLE’S INFRINGEMENT
<p><b>1[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, macOS performs a method, as set forth below.</p>
<p><b>1[a]</b> causing an interface to display a people view, the people view including:</p>	<p>macOS causes an interface (e.g., an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

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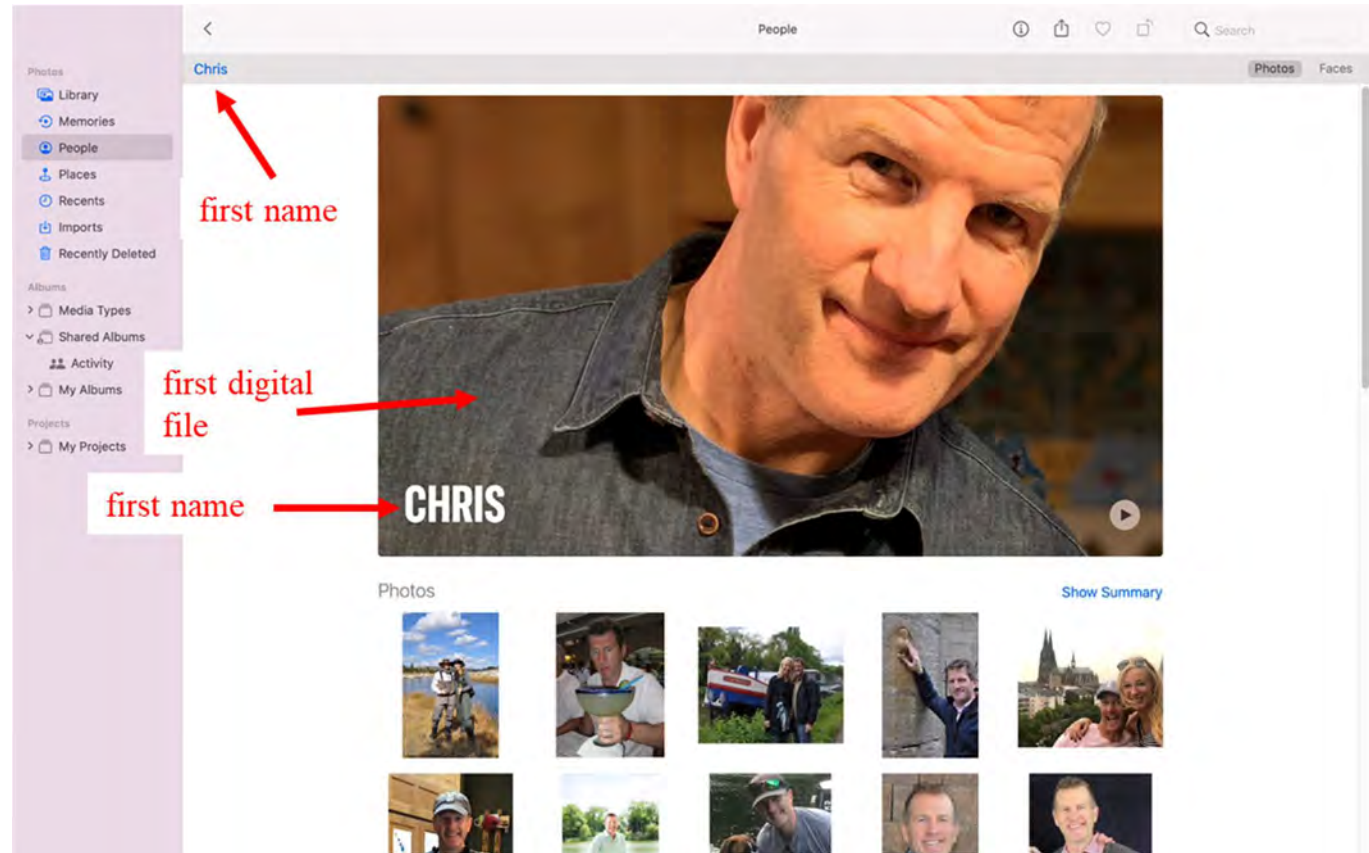


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**1[b][i]** a first digital file associated with the first person, **1[b][ii]** the first name associated with the first person, and

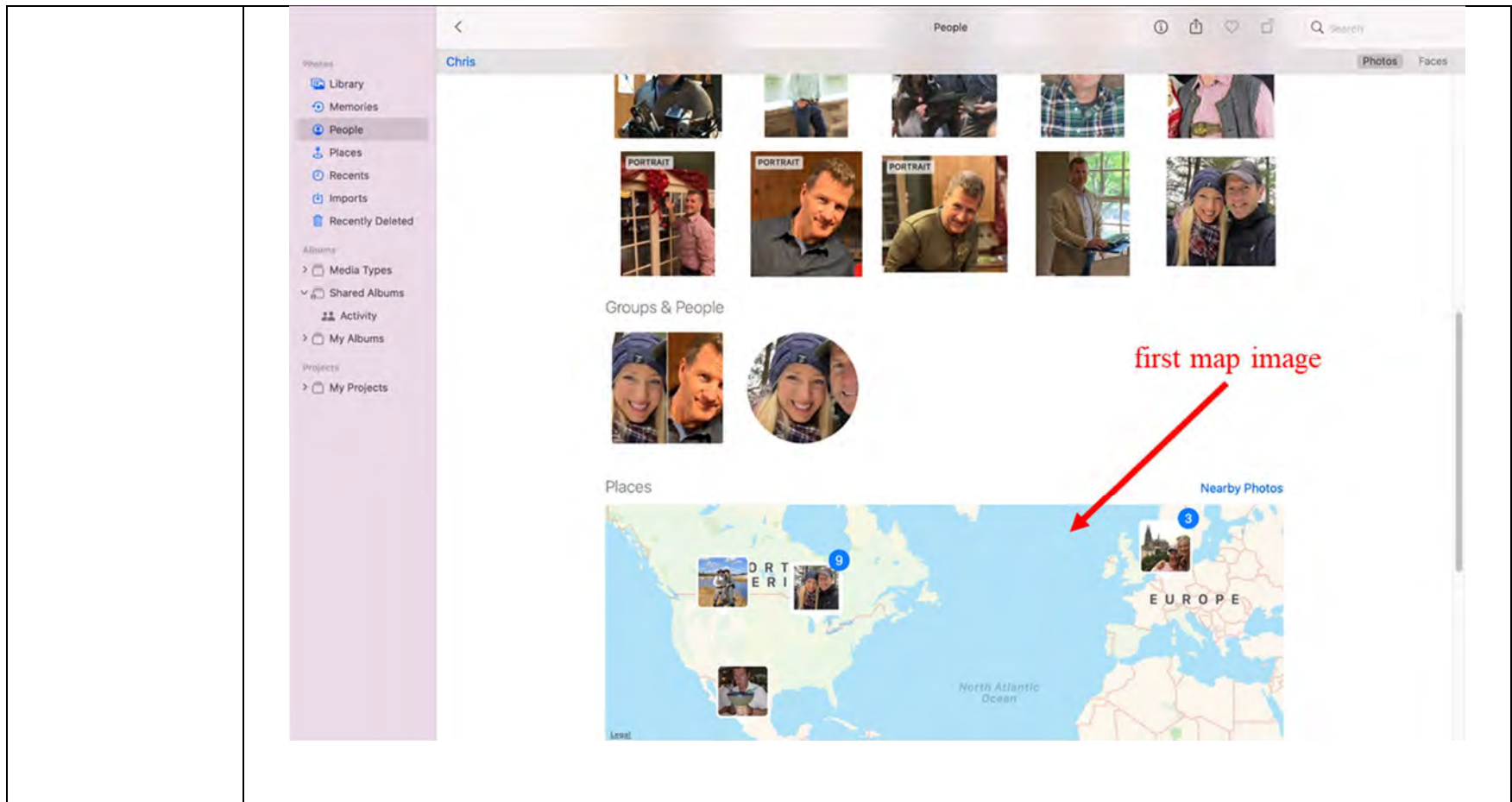
The first person view includes a first digital file associated with the first person and the first name associated with the first person.



**1[b][iii]** a first map image;

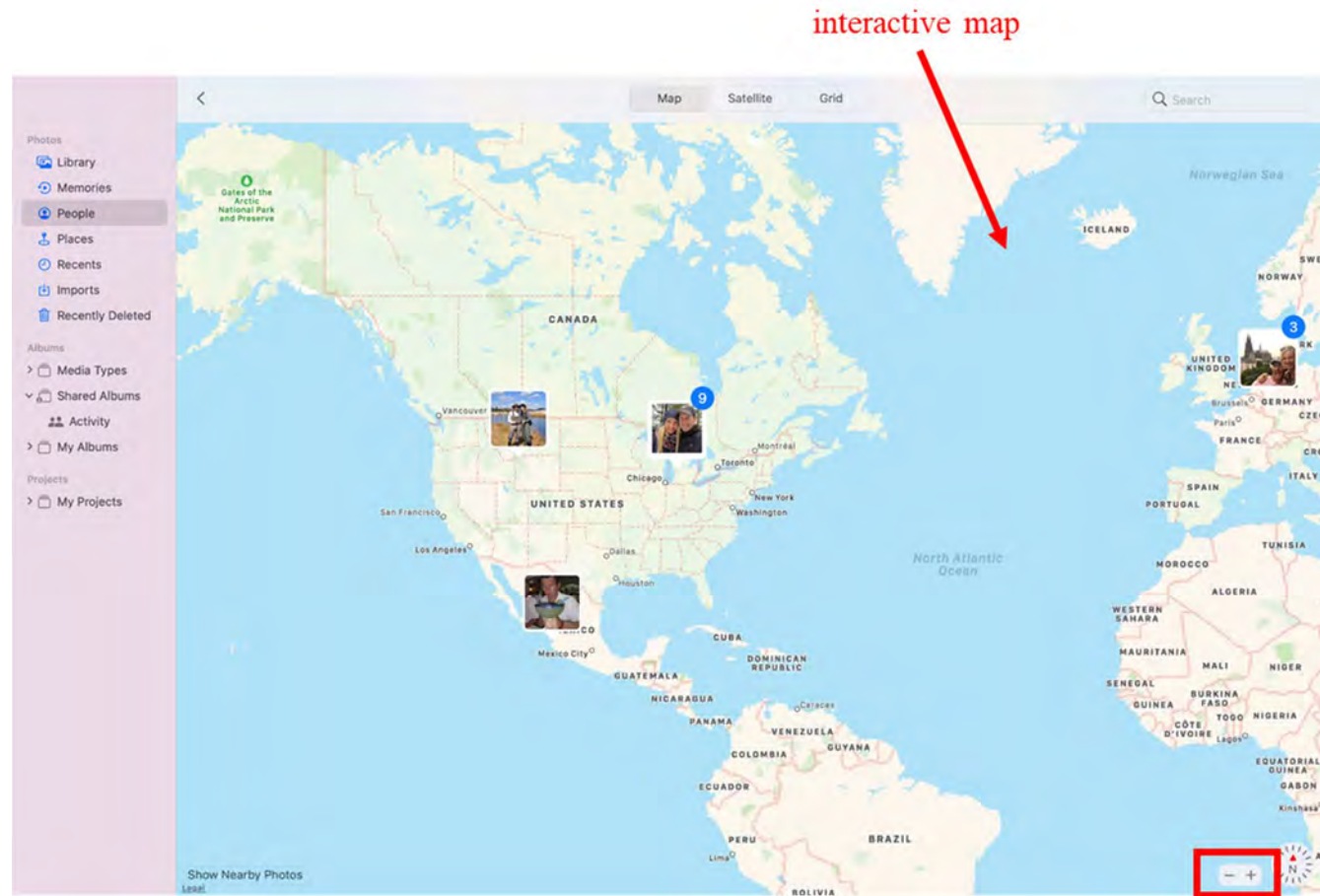
The first person view also includes a first map image.

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**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,

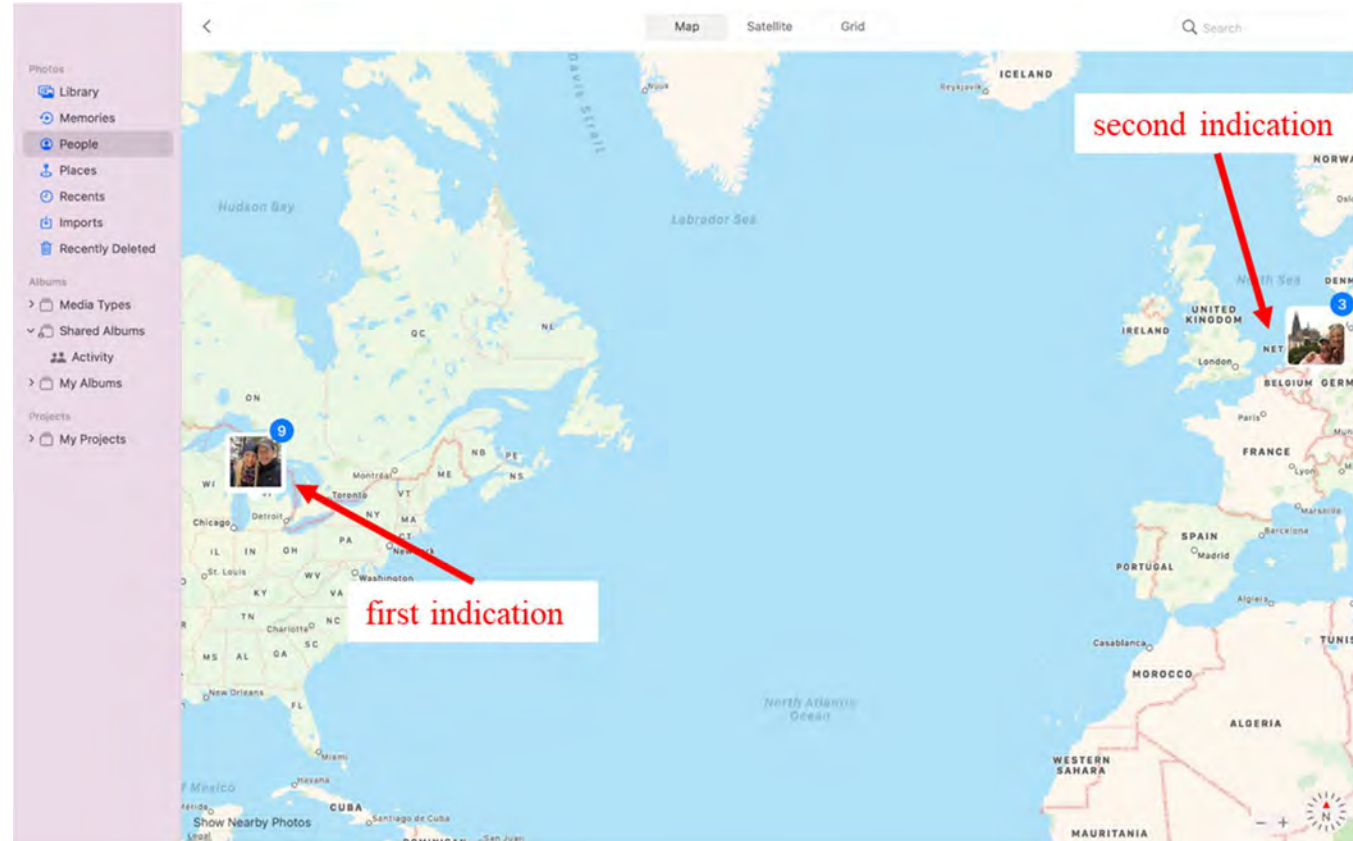
Responsive to an input that is indicative of a selection of the first map image in the first person view (e.g., tapping the first map image in the first person view), macOS causes a first location view to be displayed on the interface. The first location view includes an interactive geographic map. The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





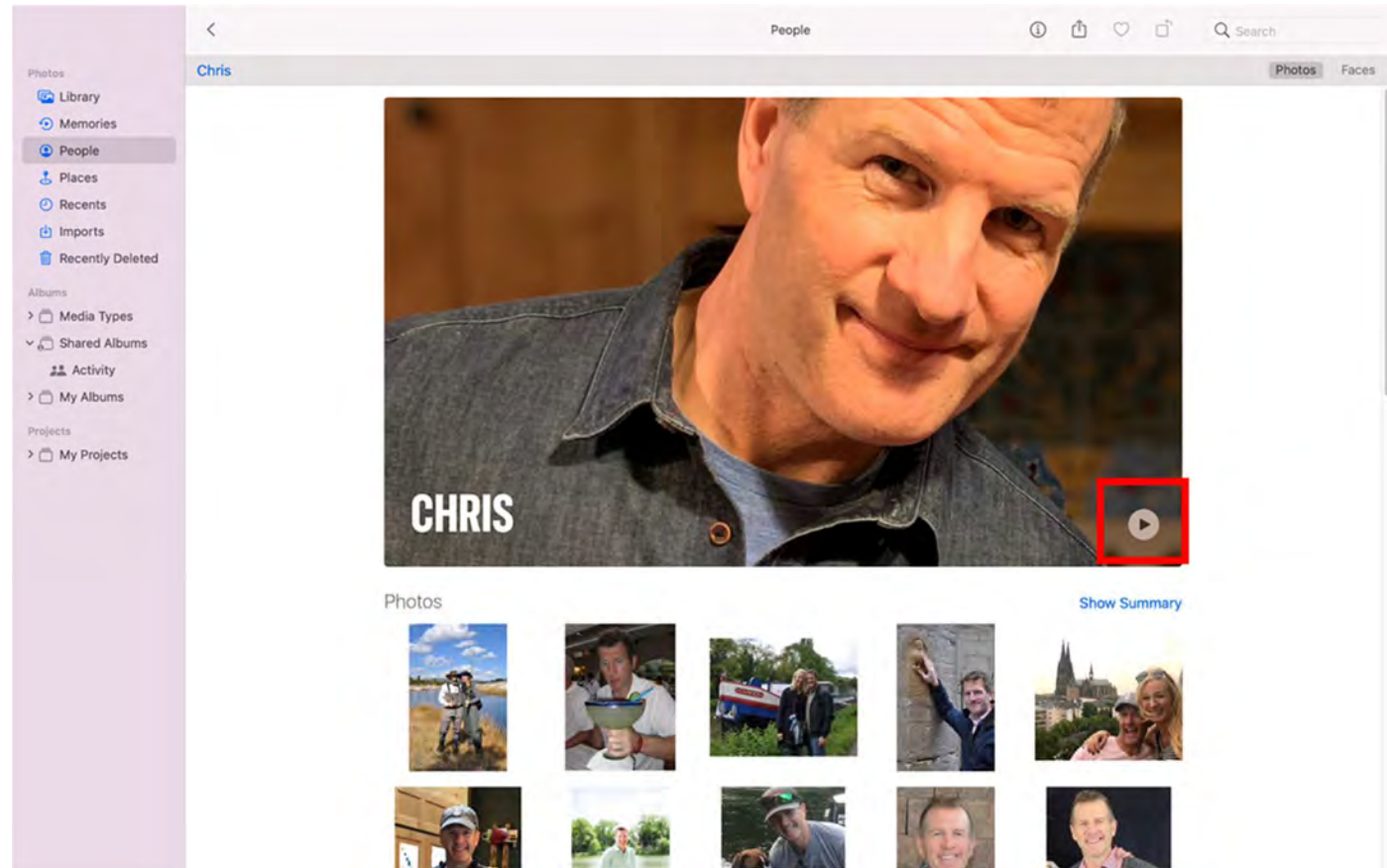
**1[c][ii]**  
a first indication positioned at a first location on the interactive geographic map, and **1[c][iii]**  
a second indication positioned at a second location on the interactive geographic map; and

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.

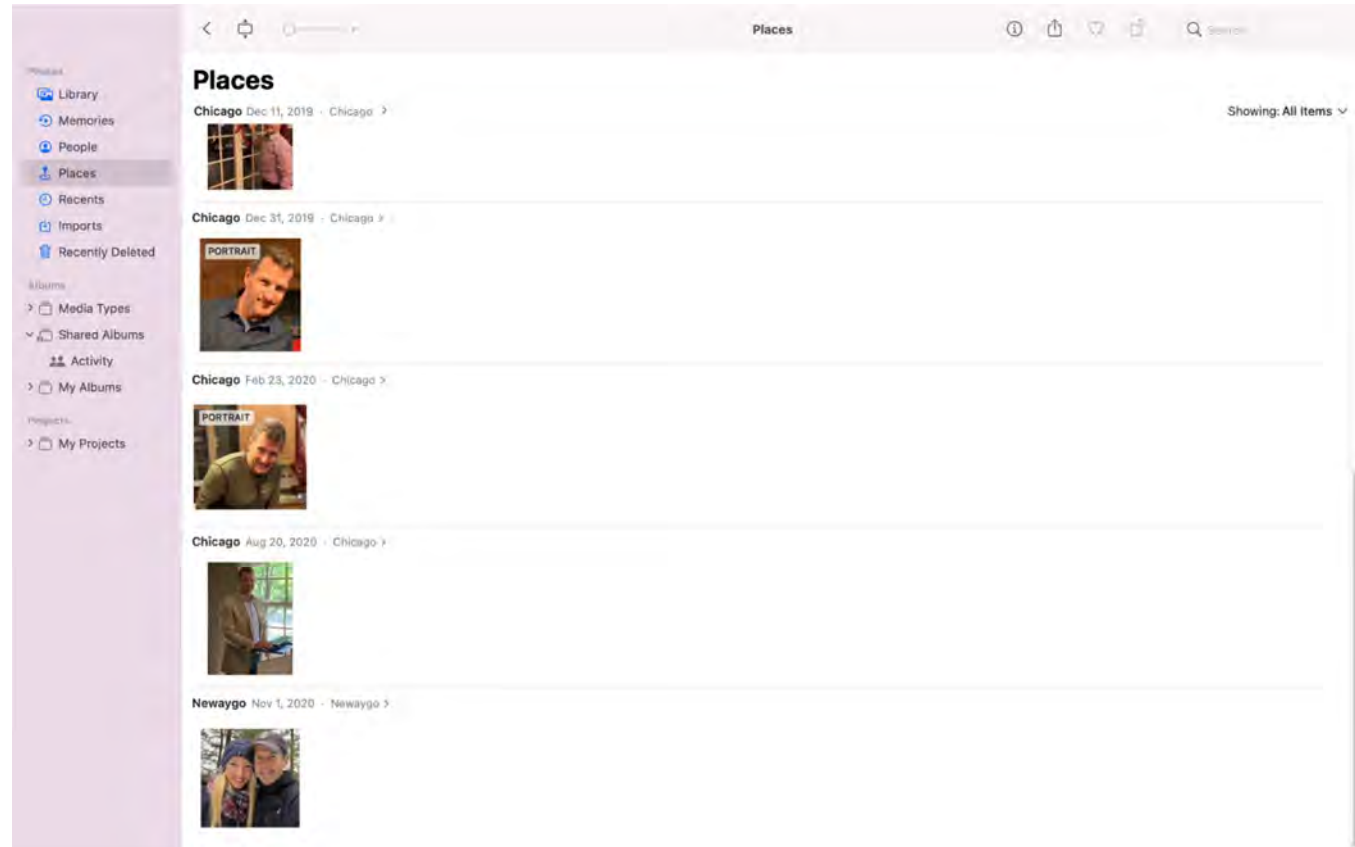
Responsive to an input that is indicative of a selection of the first digital file in the first person view (e.g., the “Play” element annotated below), macOS causes a slideshow to be displayed on the interface, the slideshow including a plurality of images associated with the first person.



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.

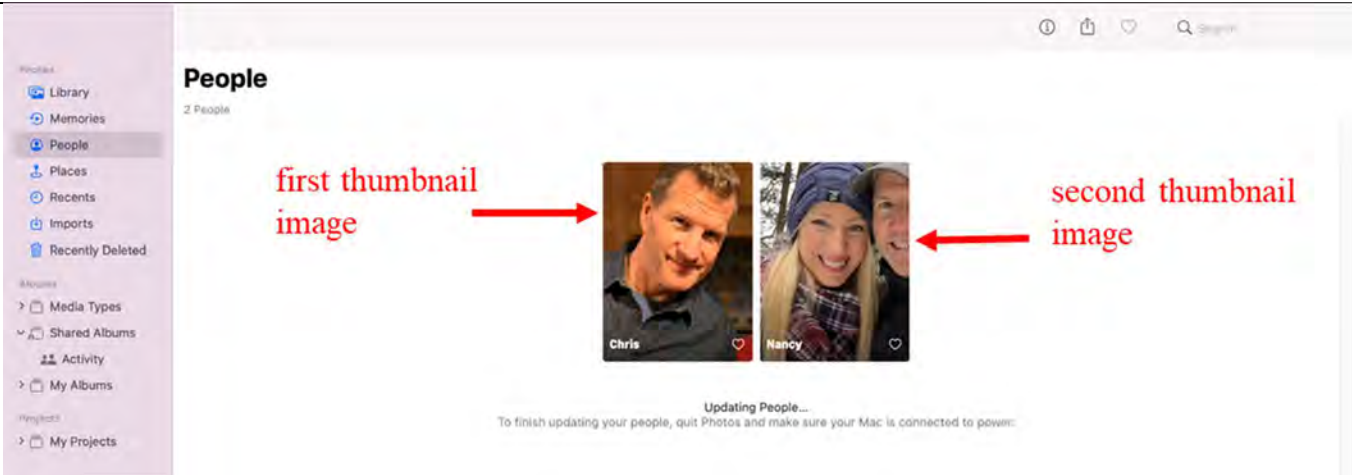
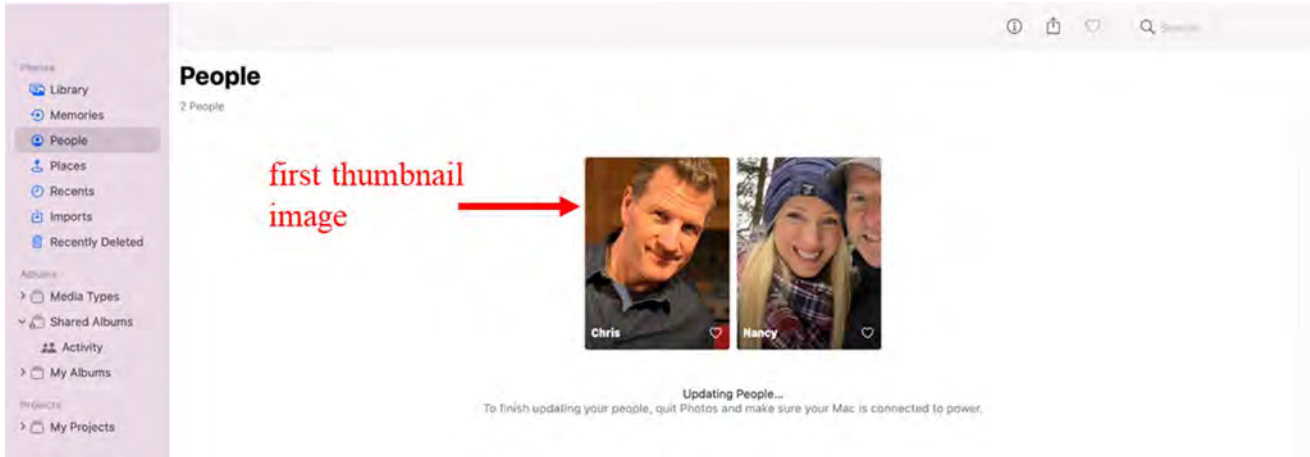


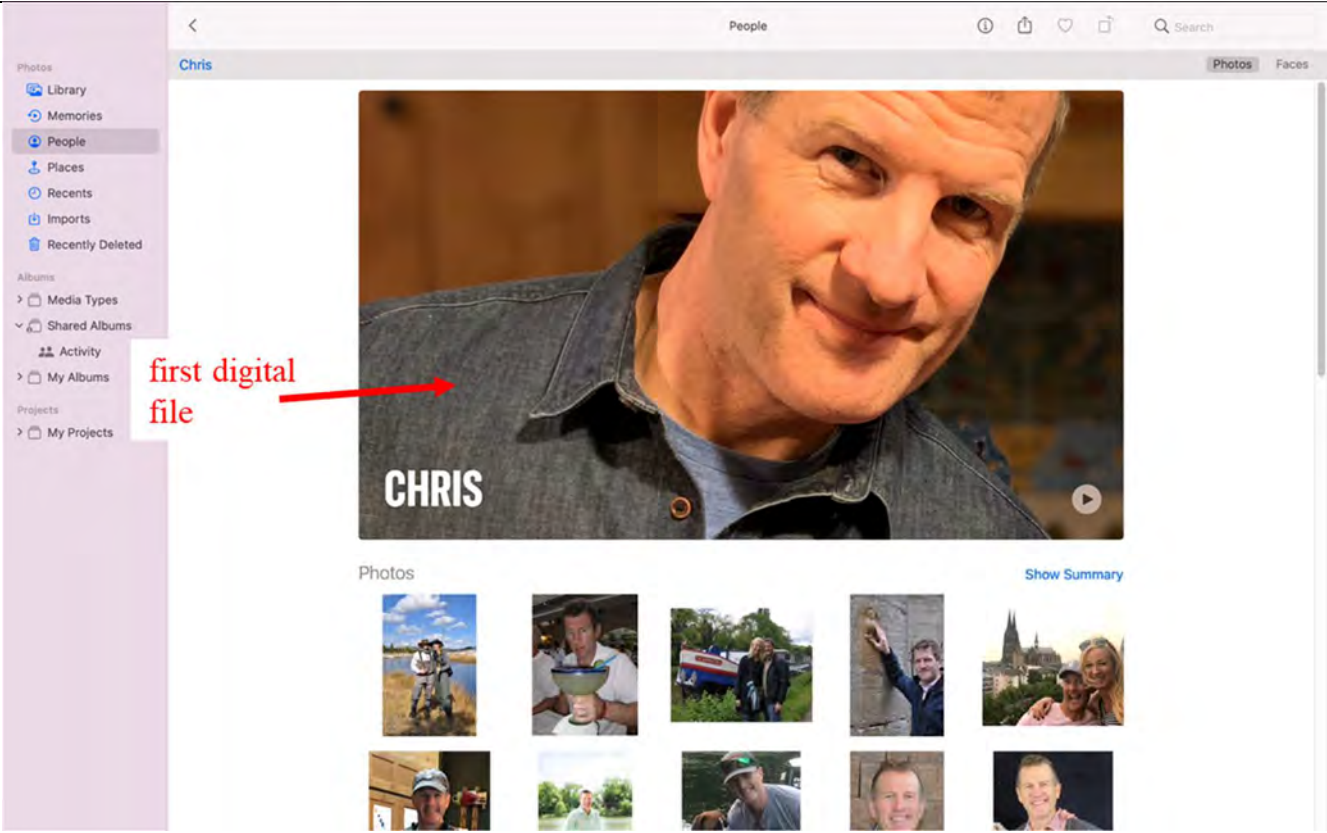
The second indication is associated with a second set of digital files and the second location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the second indication.

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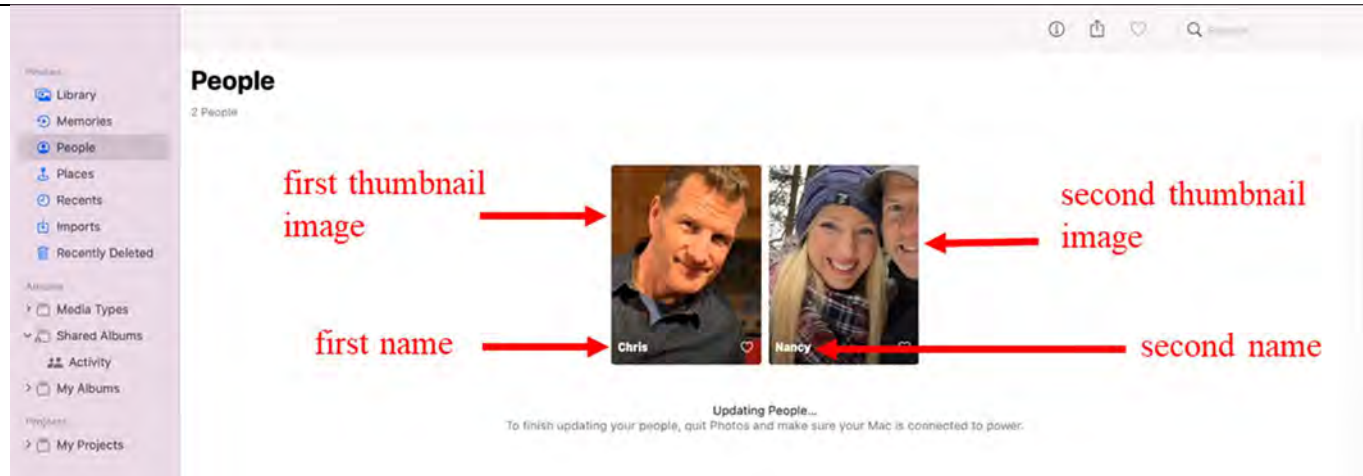
<p><b>3.</b> The method of claim 2, wherein the first set of digital files and the second set of digital files are associated with the first person.</p>	<p>The first set of digital files and the second set of digital files are associated with the first person. As shown below, the first person is included in photographs in the first and second sets of digital files.</p>

<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>The screenshot shows the 'People' view in the macOS Photos app. On the left is a sidebar with categories like 'Favorites', 'Albums', and 'Projects'. The main area displays two person thumbnails. The first thumbnail is a portrait of a man labeled 'Chris'. The second thumbnail is a photo of a woman labeled 'Nancy' with another person partially visible. Red text 'first thumbnail image' has an arrow pointing to the Chris thumbnail, and 'second thumbnail image' has an arrow pointing to the Nancy thumbnail. Below the thumbnails, it says 'Updating People...' and 'To finish updating your people, quit Photos and make sure your Mac is connected to power.'</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>This screenshot is identical to the one above, but the second thumbnail is not highlighted. A red text label 'first thumbnail image' has an arrow pointing to the 'Chris' thumbnail. The rest of the interface, including the sidebar and the 'Updating People...' message, is the same.</p>

	 <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 is titled 'Chris' and features a large portrait photo of a man. A red arrow points to the bottom-left corner of this photo, where the name 'CHRIS' is displayed in white capital letters. Below the main photo is a grid of smaller thumbnail images. The text 'first digital file' is written in red next to the arrow.</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.



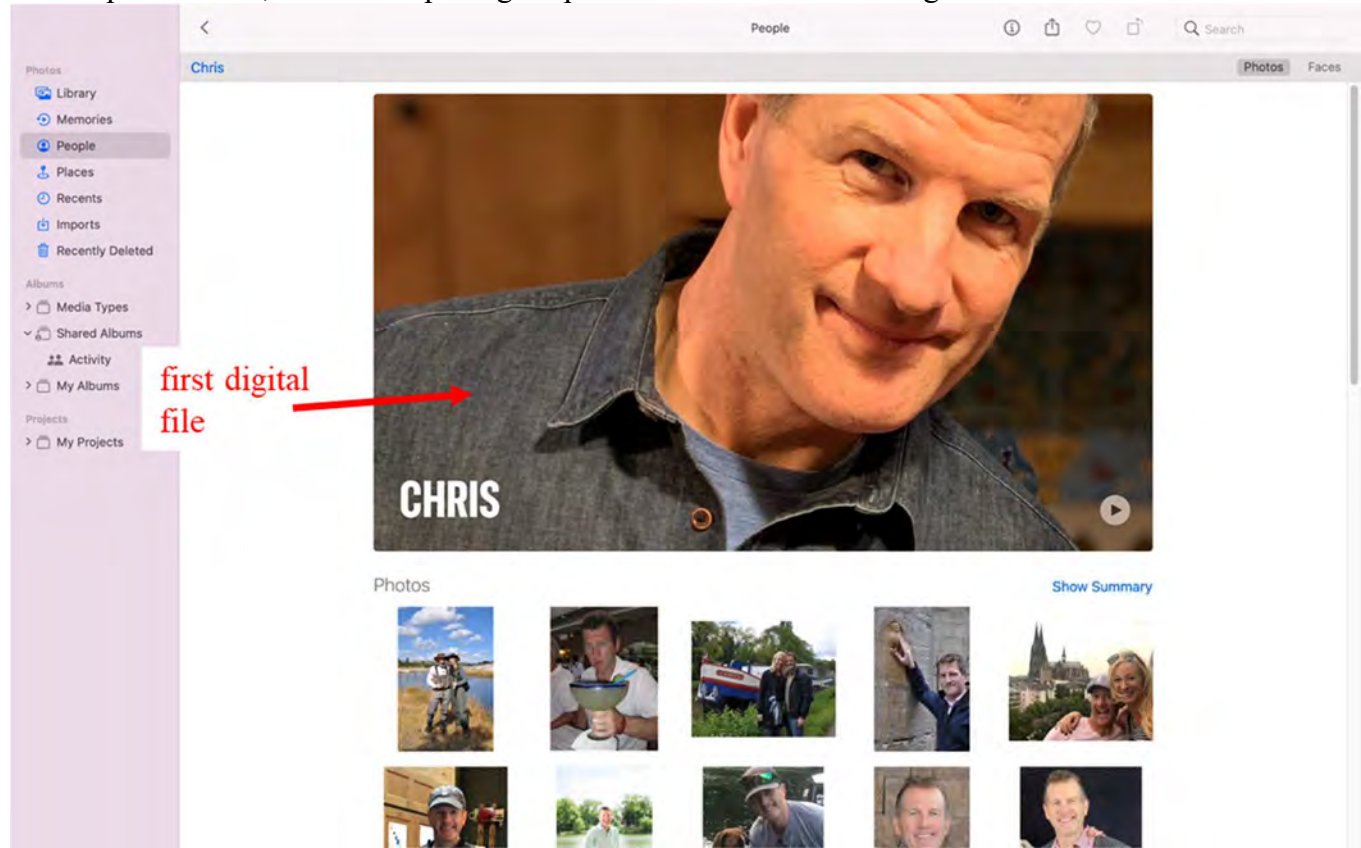
To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

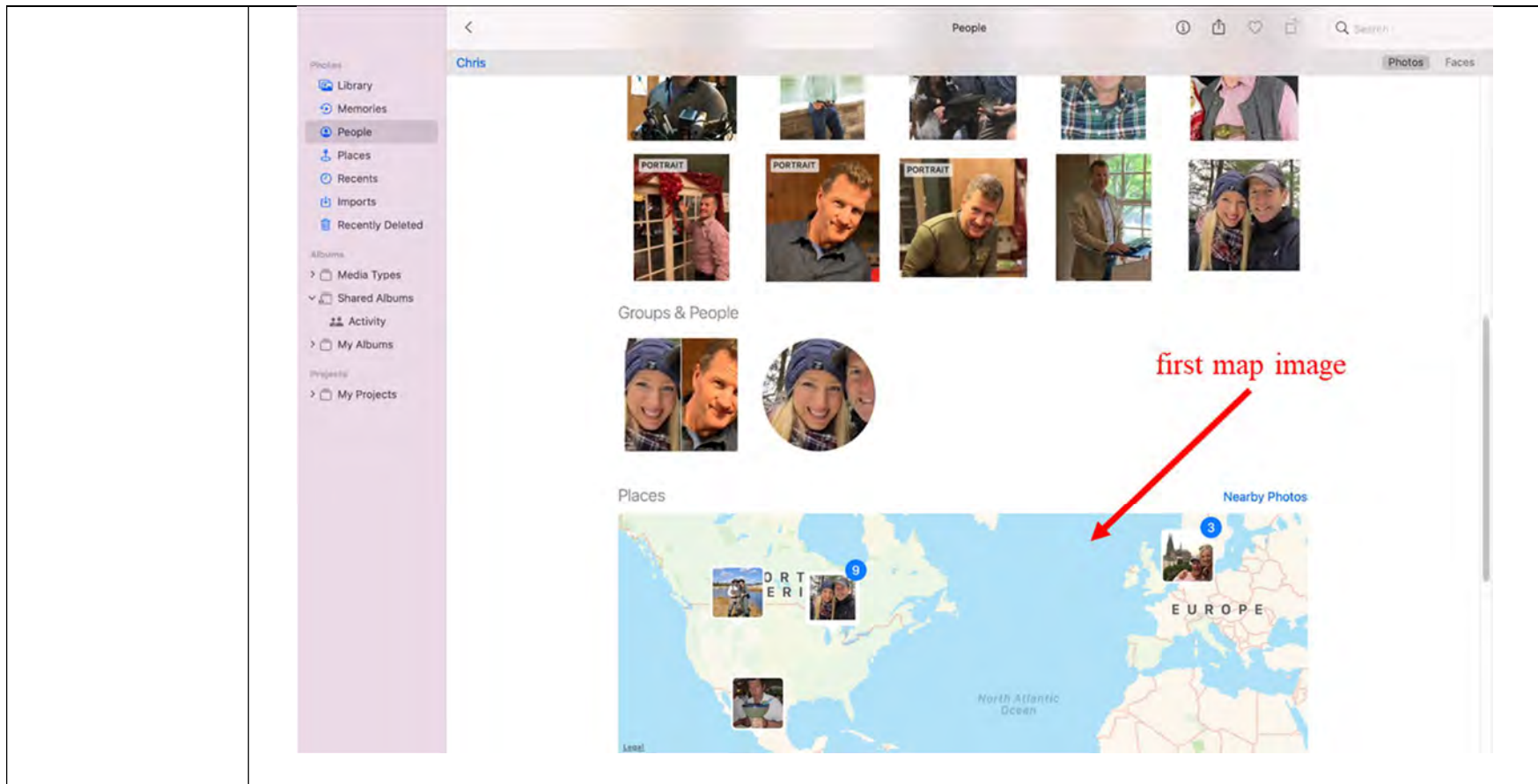
Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name 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.





**8.** The method of claim 1, further comprising, prior to the causing the interface to display the people view:

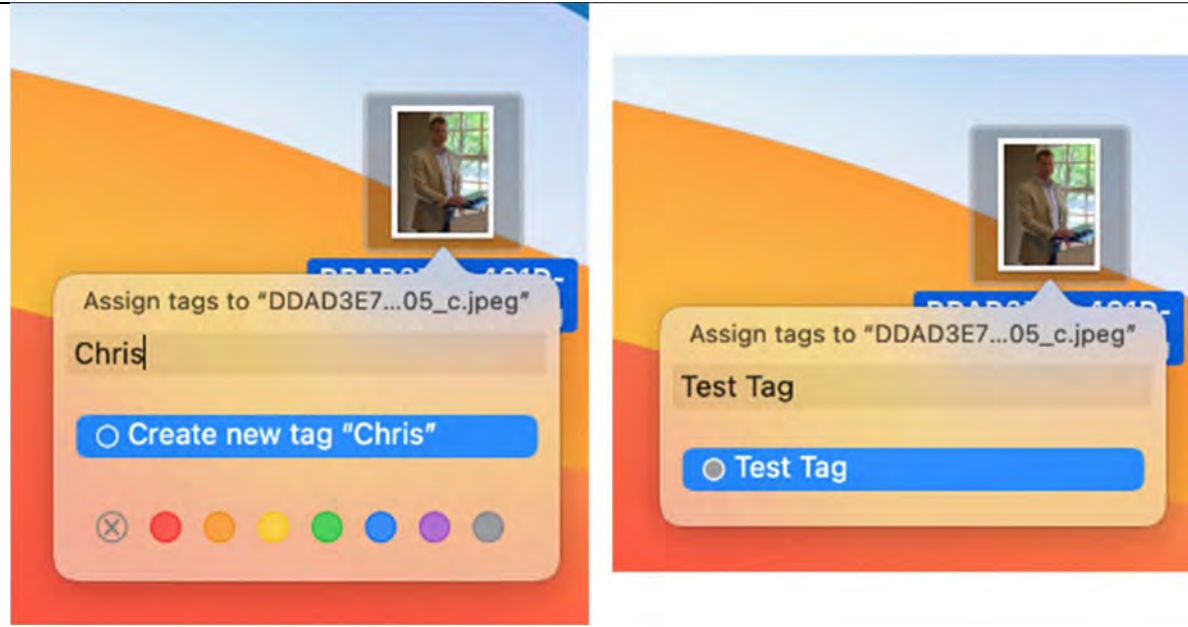
*See information for claim 1.*

**8[a]** causing the first digital file to

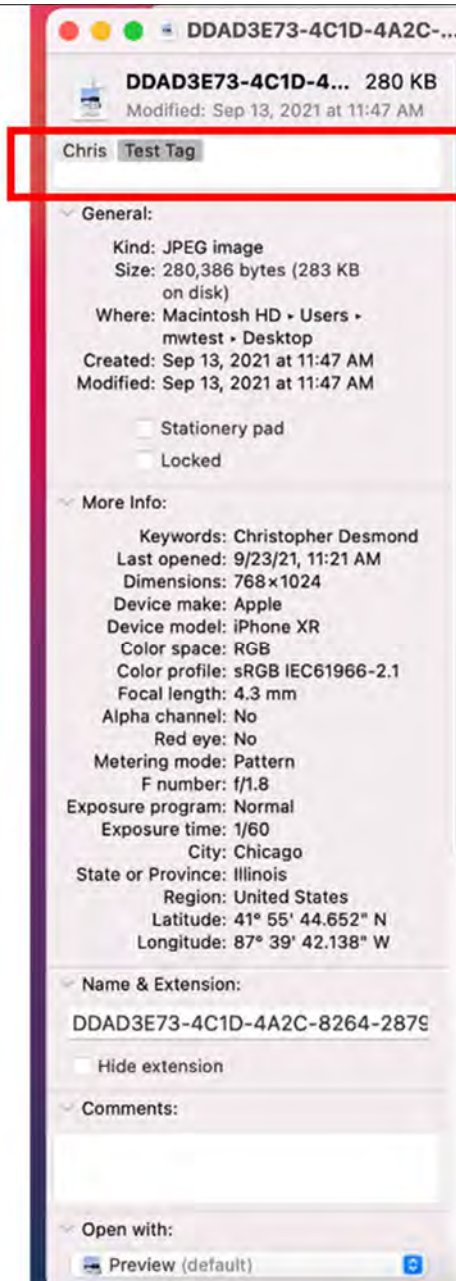
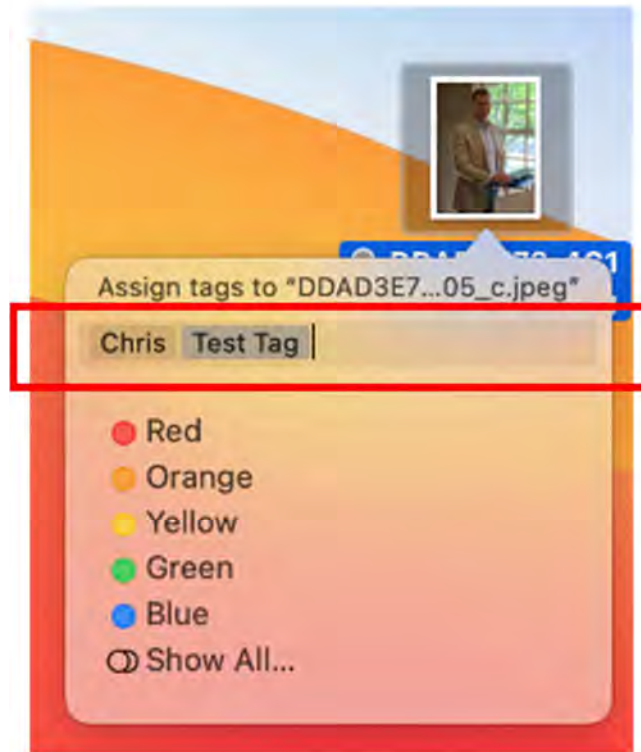
Prior to the causing the interface to display the people view, macOS causes the first digital file to be displayed on the interface.

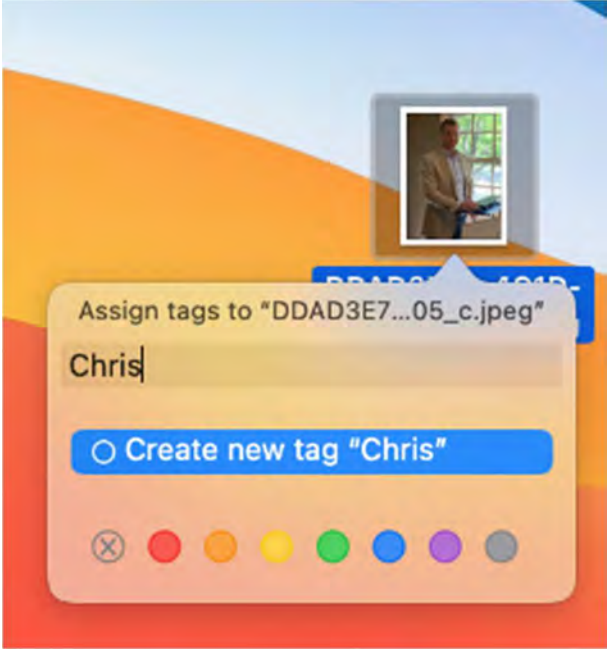



8[b] receiving alphanumeric text as a first user-generated tag; and

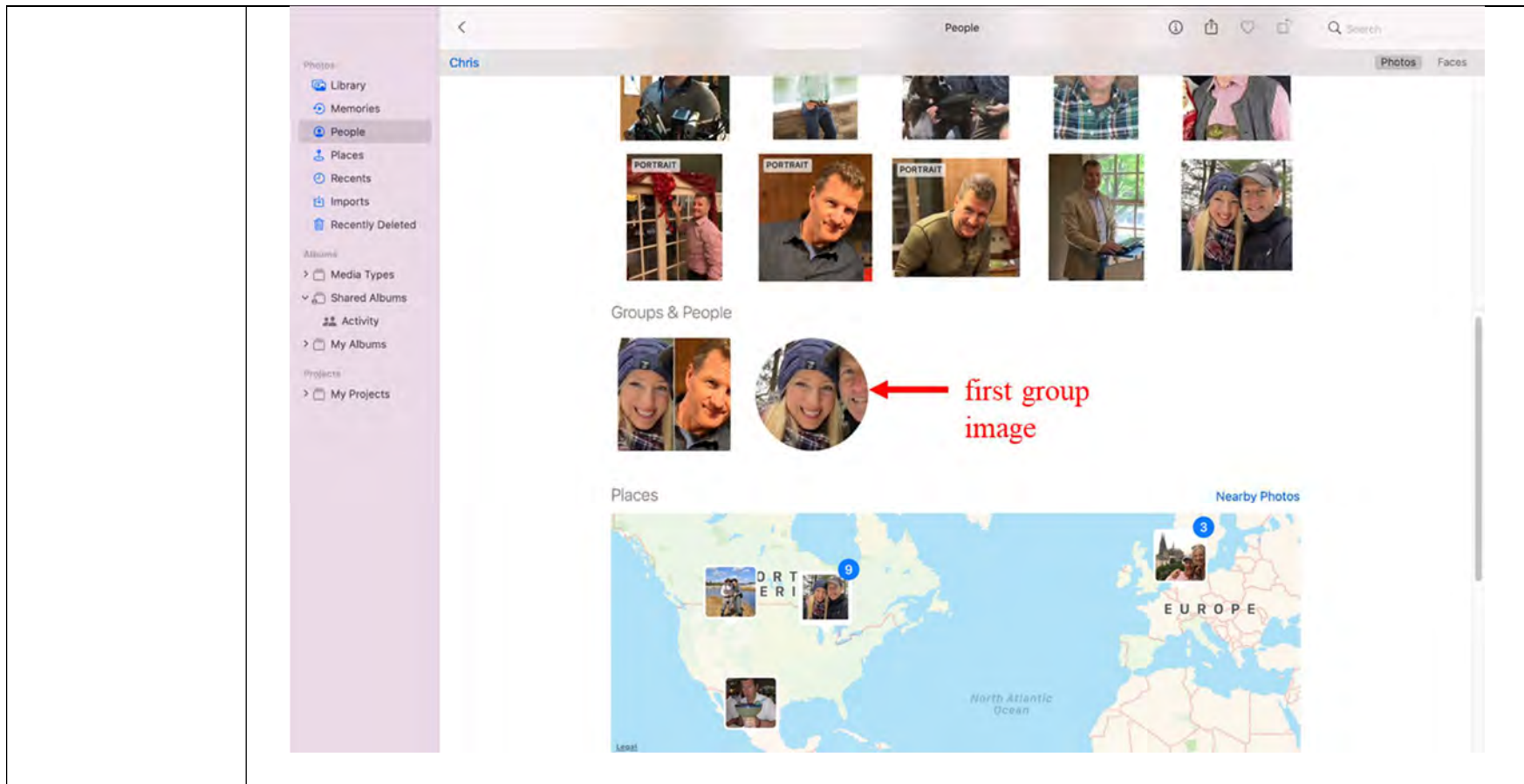


8[c] associating the first digital file with the first user-generated tag.



<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><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>

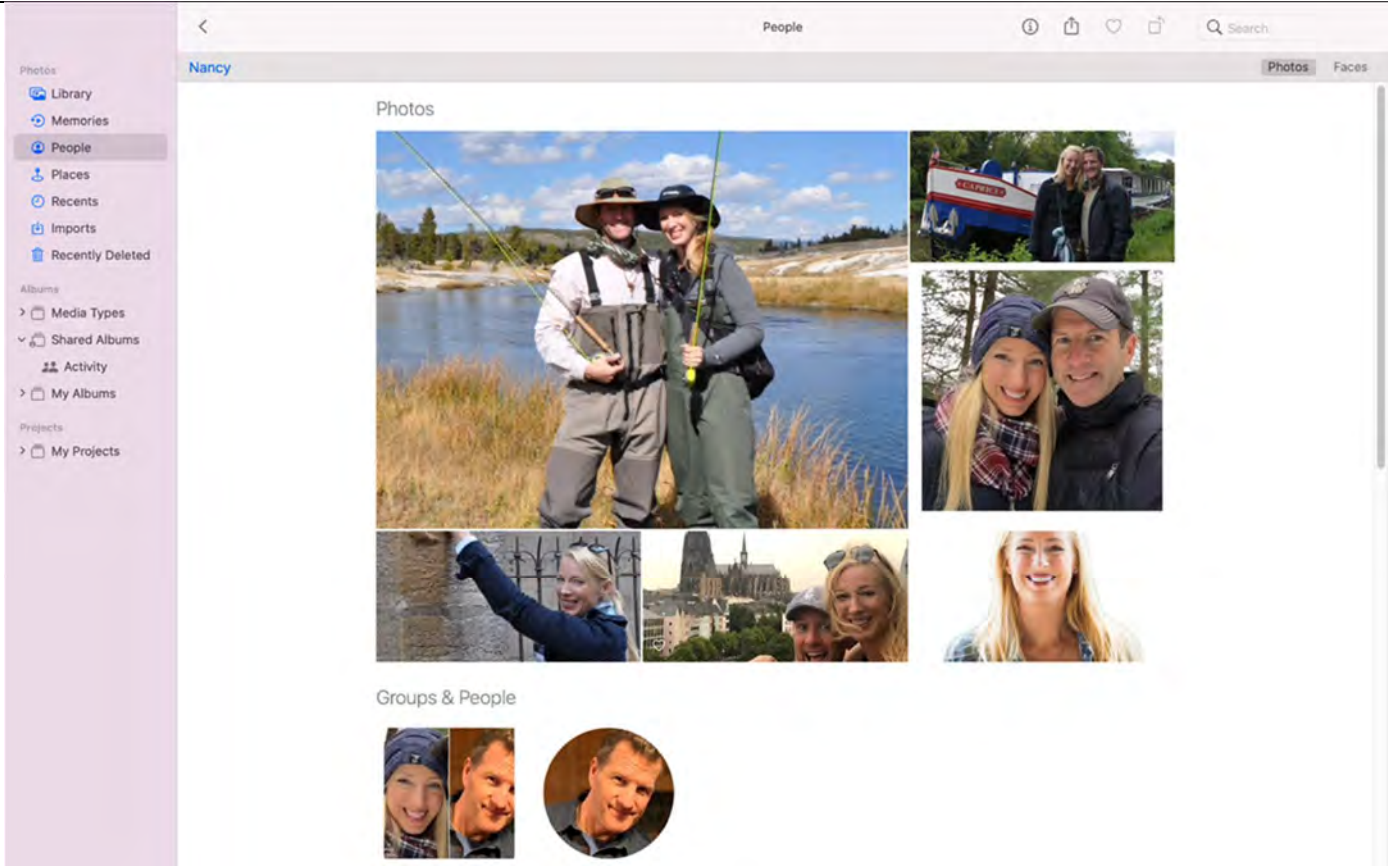
<p>first user-generated tag.</p>	
<p><b>11[pre]</b> The method of claim 1, wherein</p>	<p>See information for claim 1.</p>
<p><b>11[a]</b> the first person view includes a first group image, and</p>	<p>The first person view includes a first group image.</p>



**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

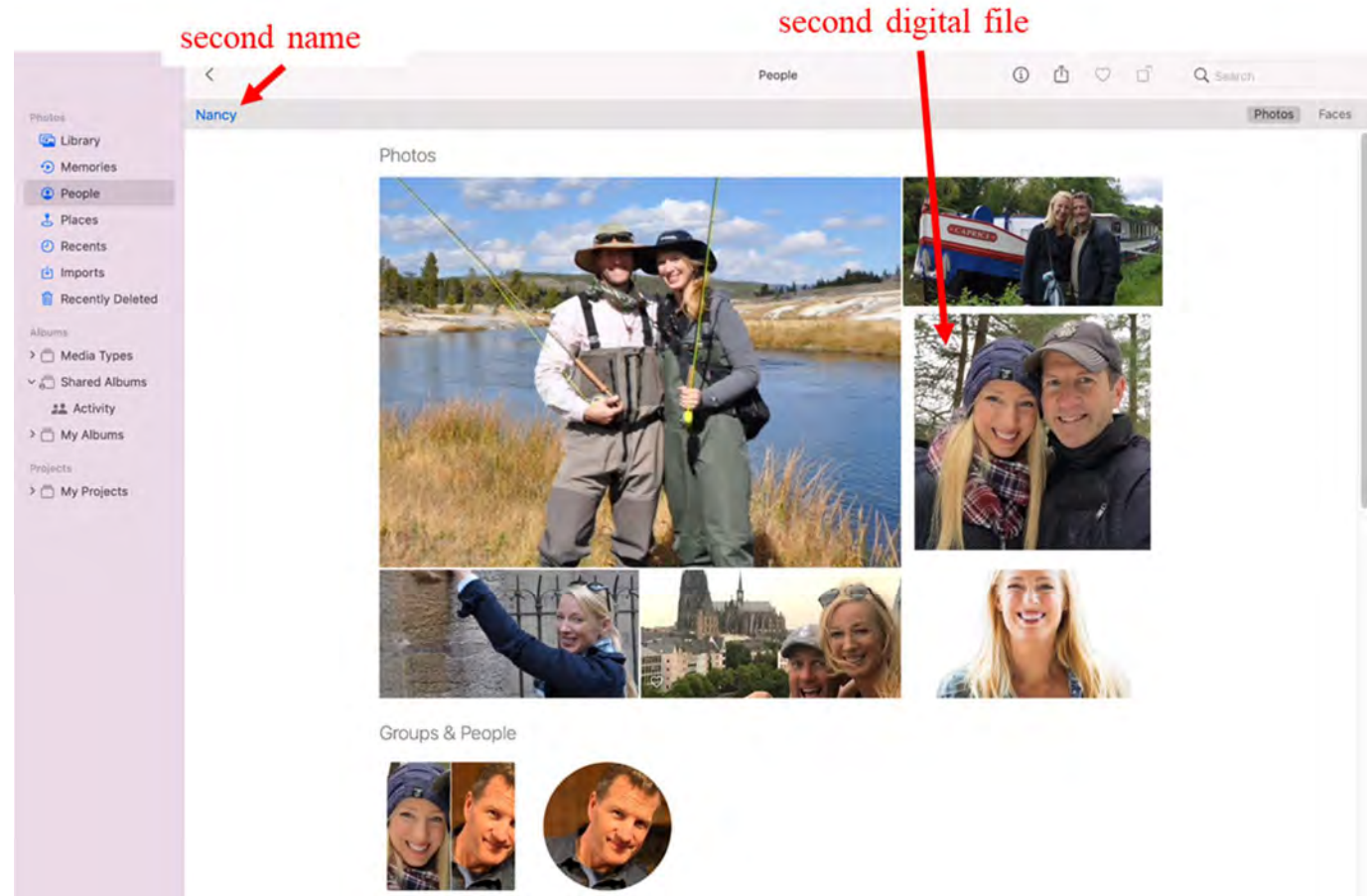
Responsive to an input that is indicative of a selection of the first group image (e.g., tapping the first group image), macOS causes a first group view to be displayed on the interface, the first group view including one or more digital files associated with another person that is associated with the 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>

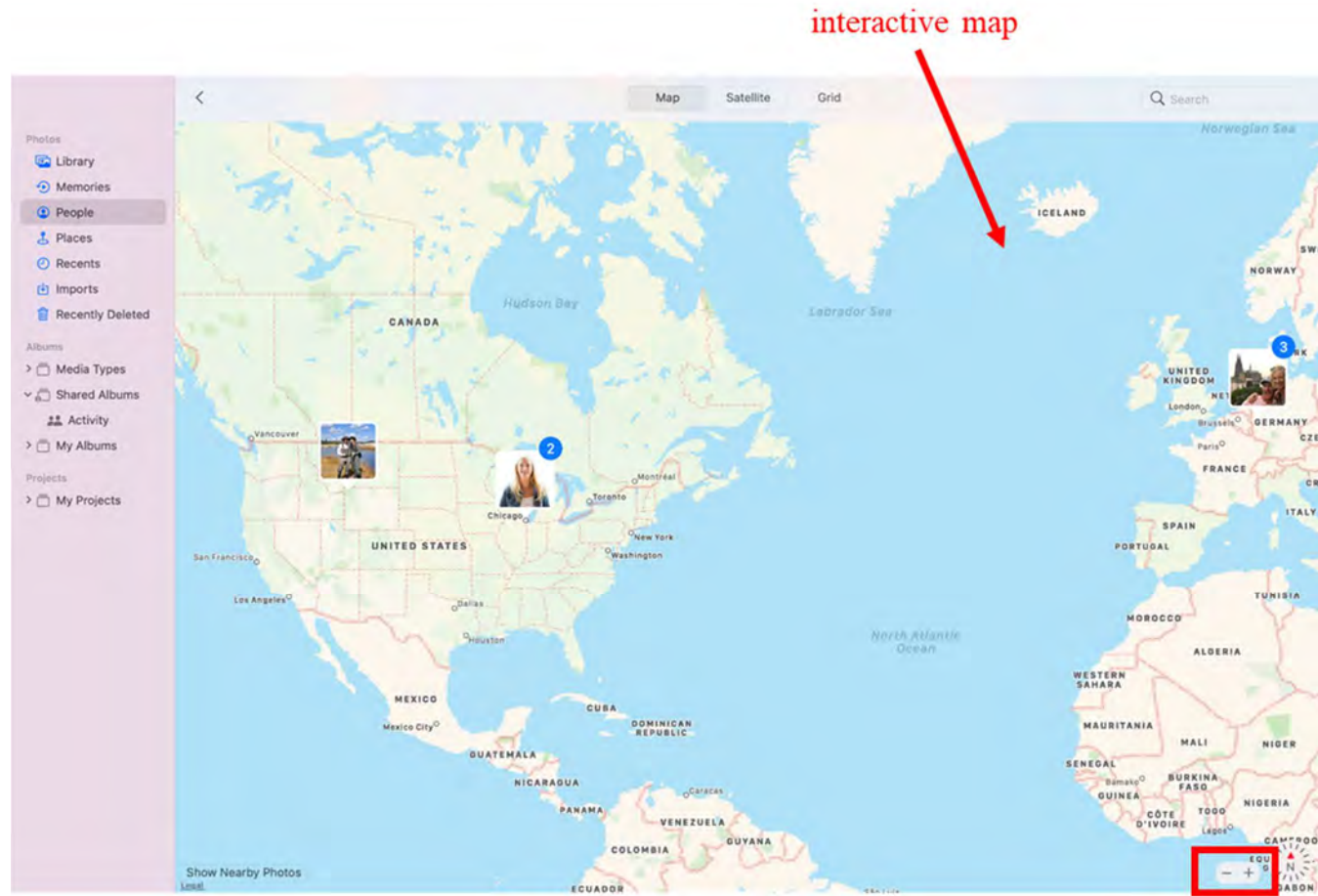
comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second 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>

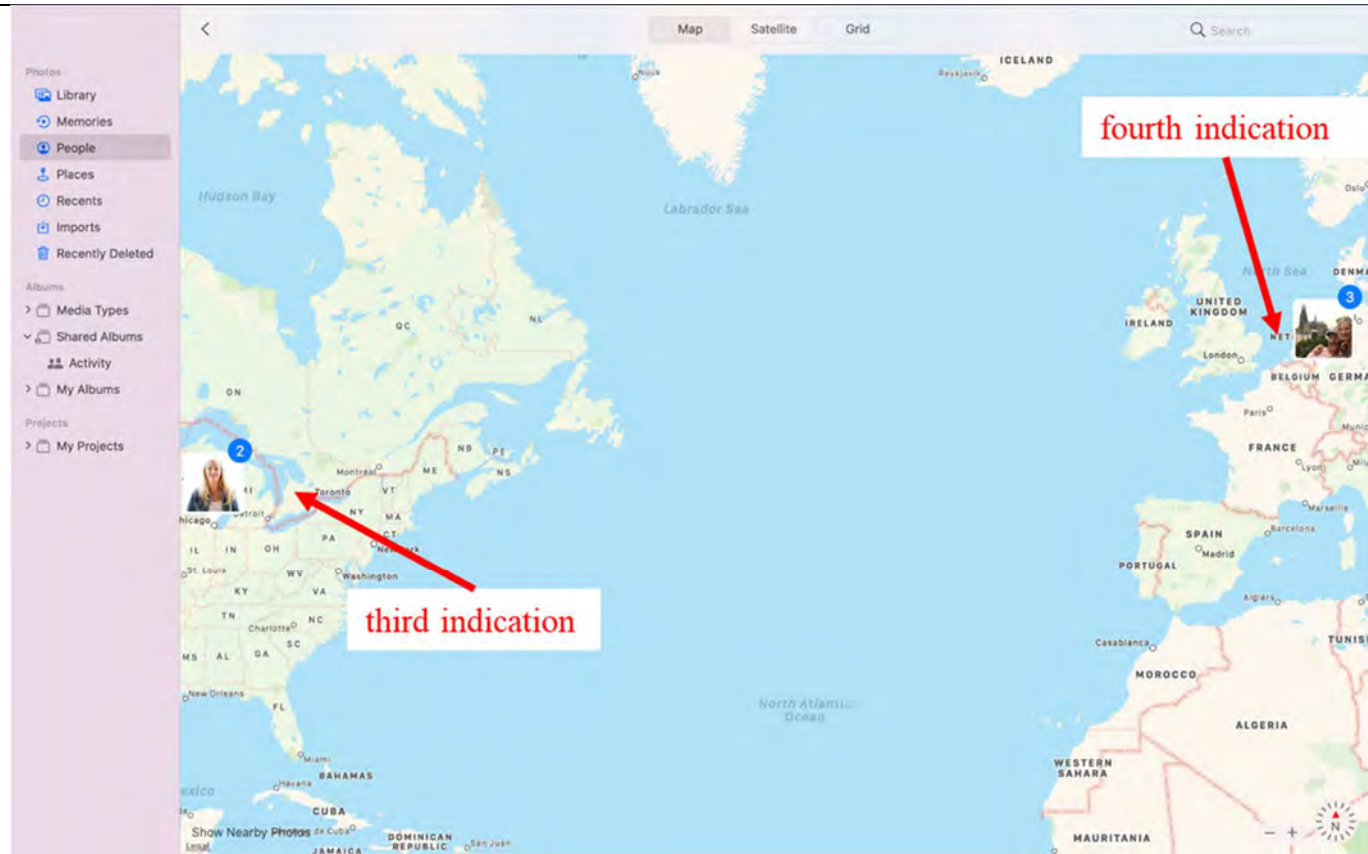
indicative of a selection of the second map image in the second person view, causing a second location view to be displayed on the interface,



**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.

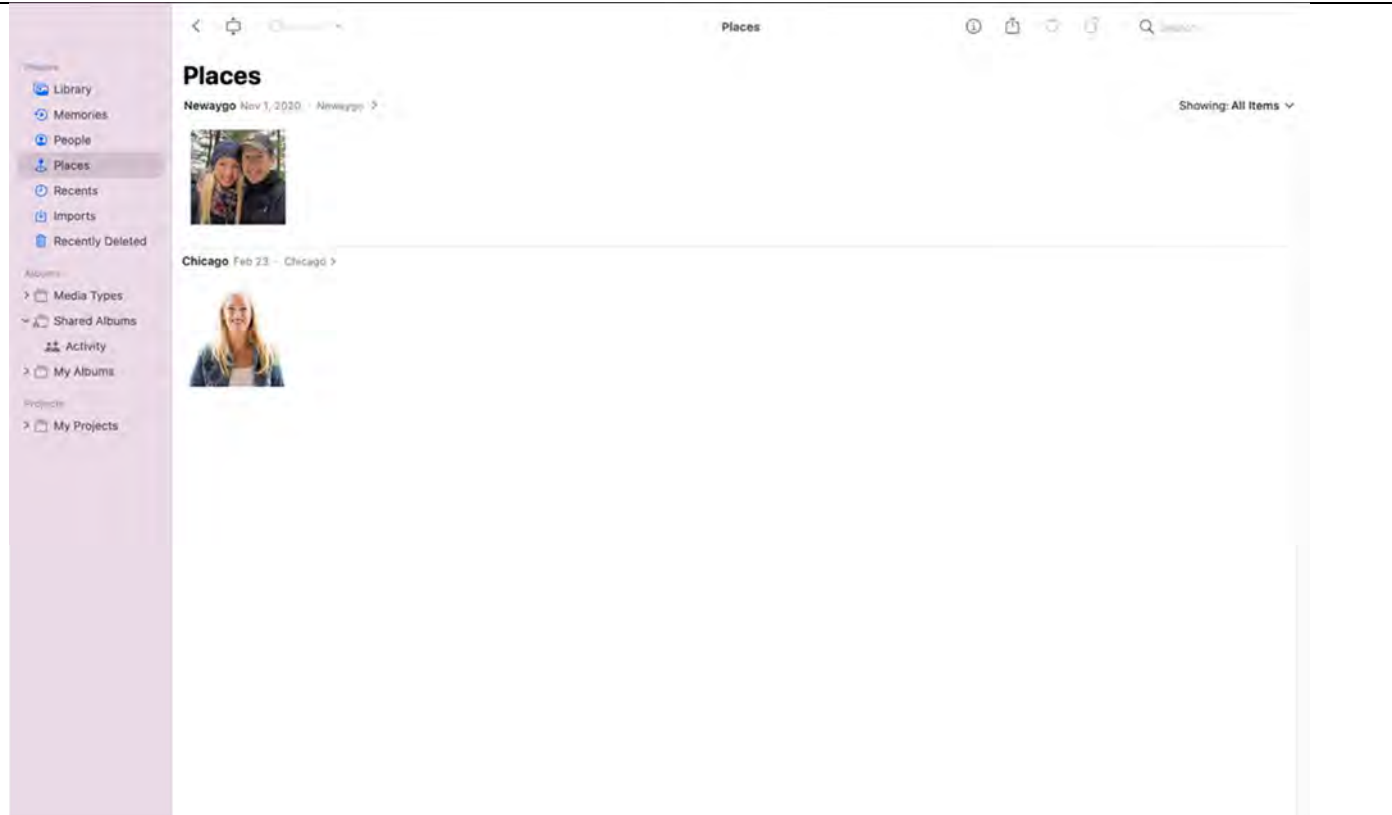


15. The method of claim 14, wherein the third indication is associated with a third set of digital files and the third location, and the fourth

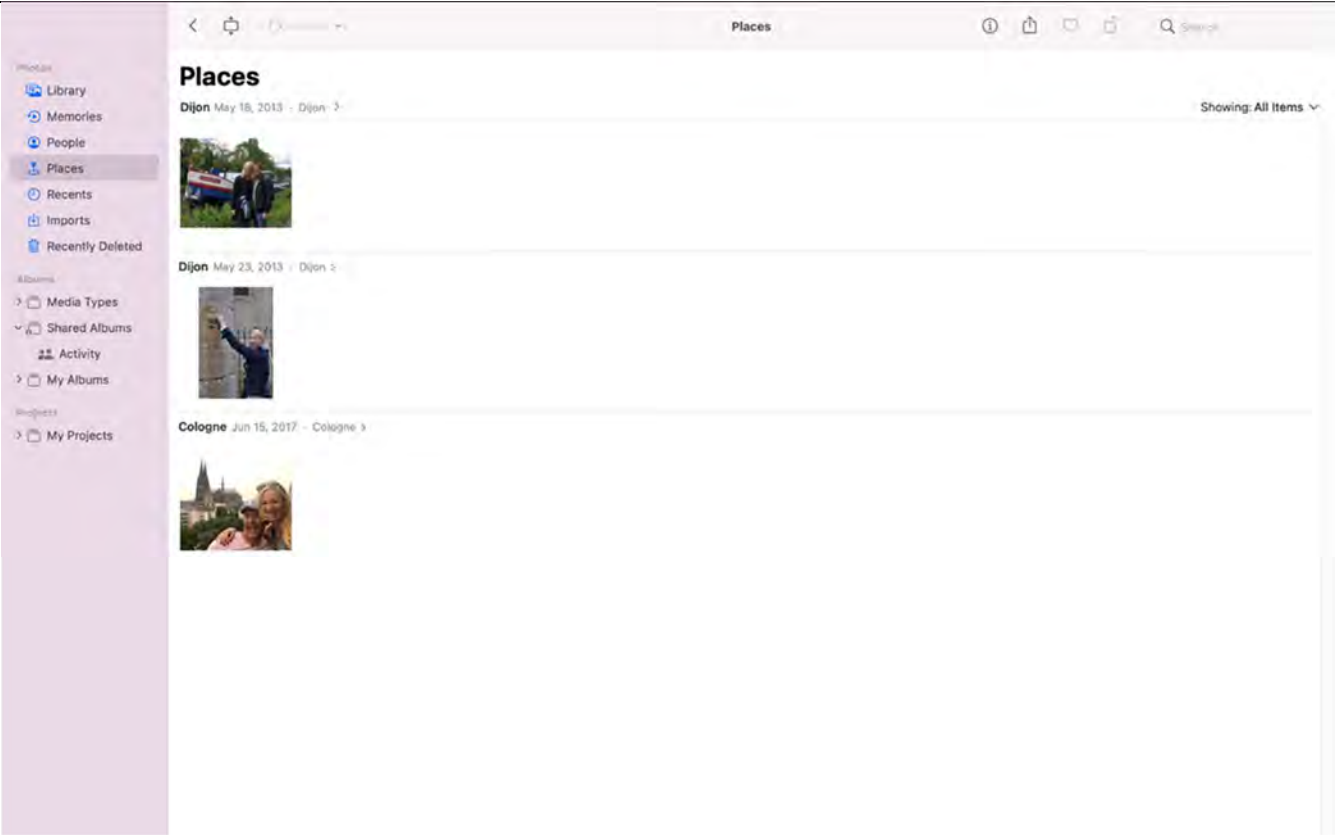
The third indication is associated with a third set of digital files and the third location.

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



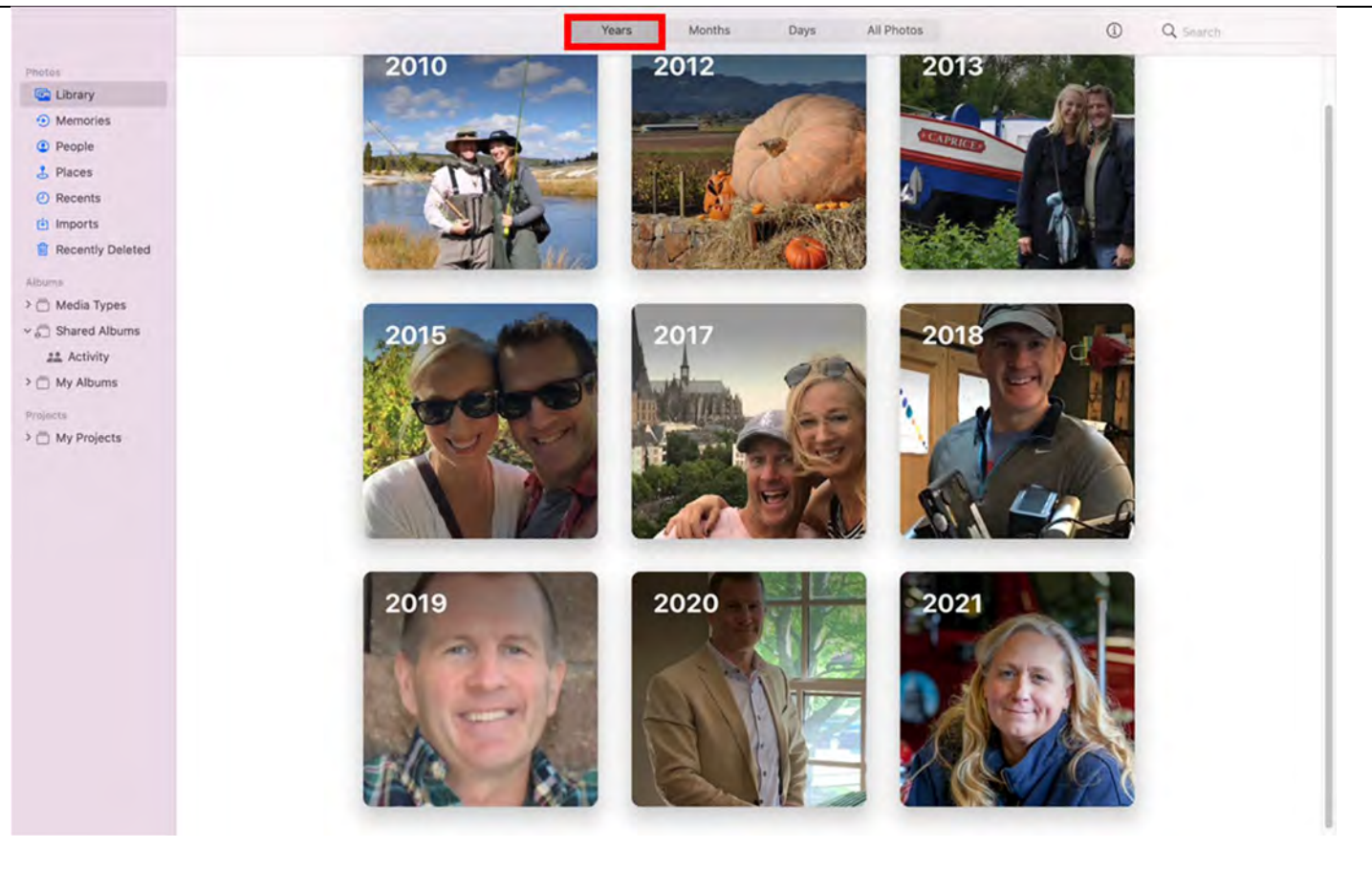
The fourth indication is associated with a fourth set of digital files and the fourth location.

	
<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>

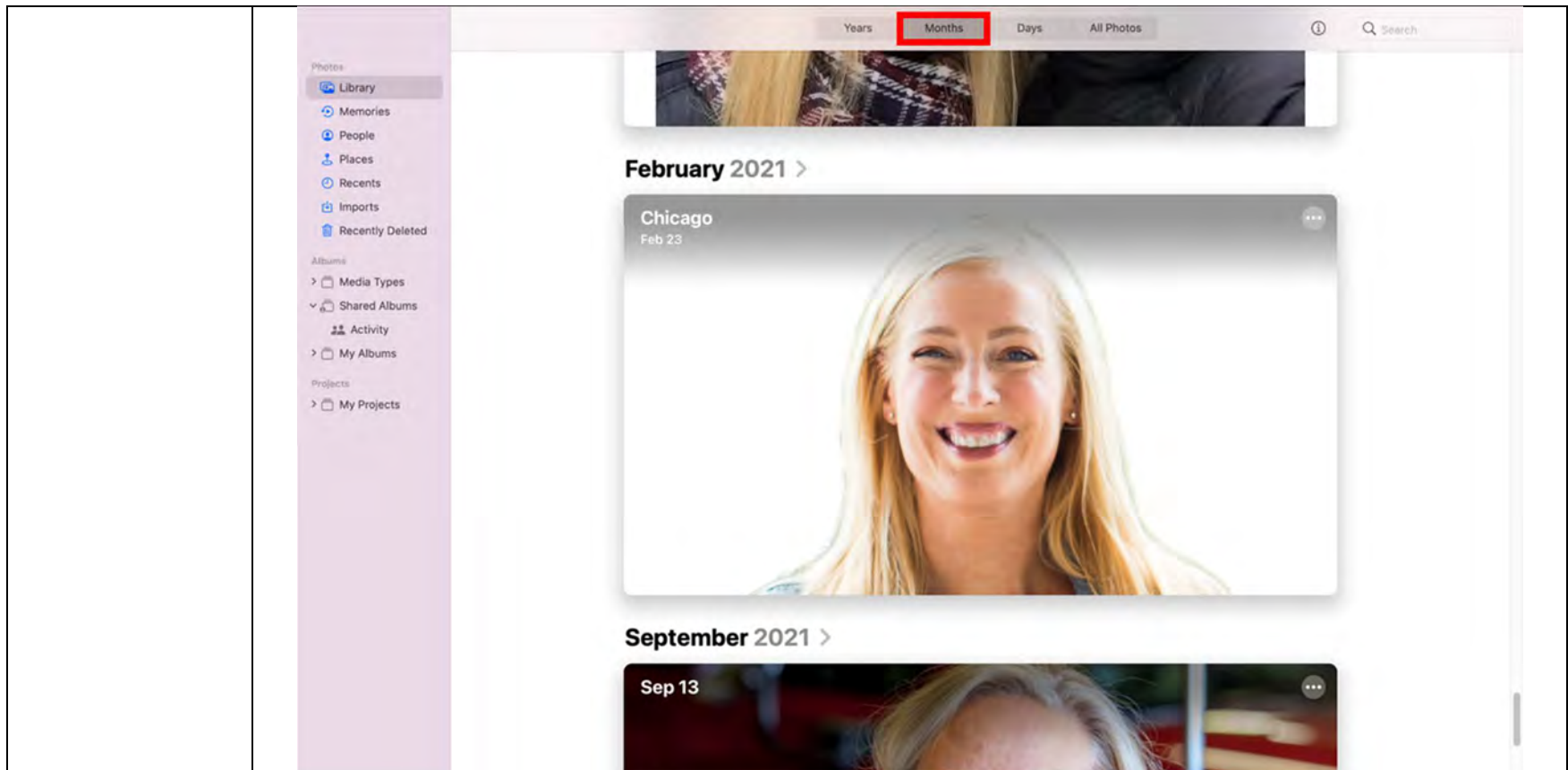
<p><b>17.</b> The method of claim 1, further comprising causing the interface to display an interactive timeline view, the</p>	<p>macOS causes the interface to display an interactive timeline view, the interactive timeline view permitting a user to group a plurality of digital files by year, month, and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



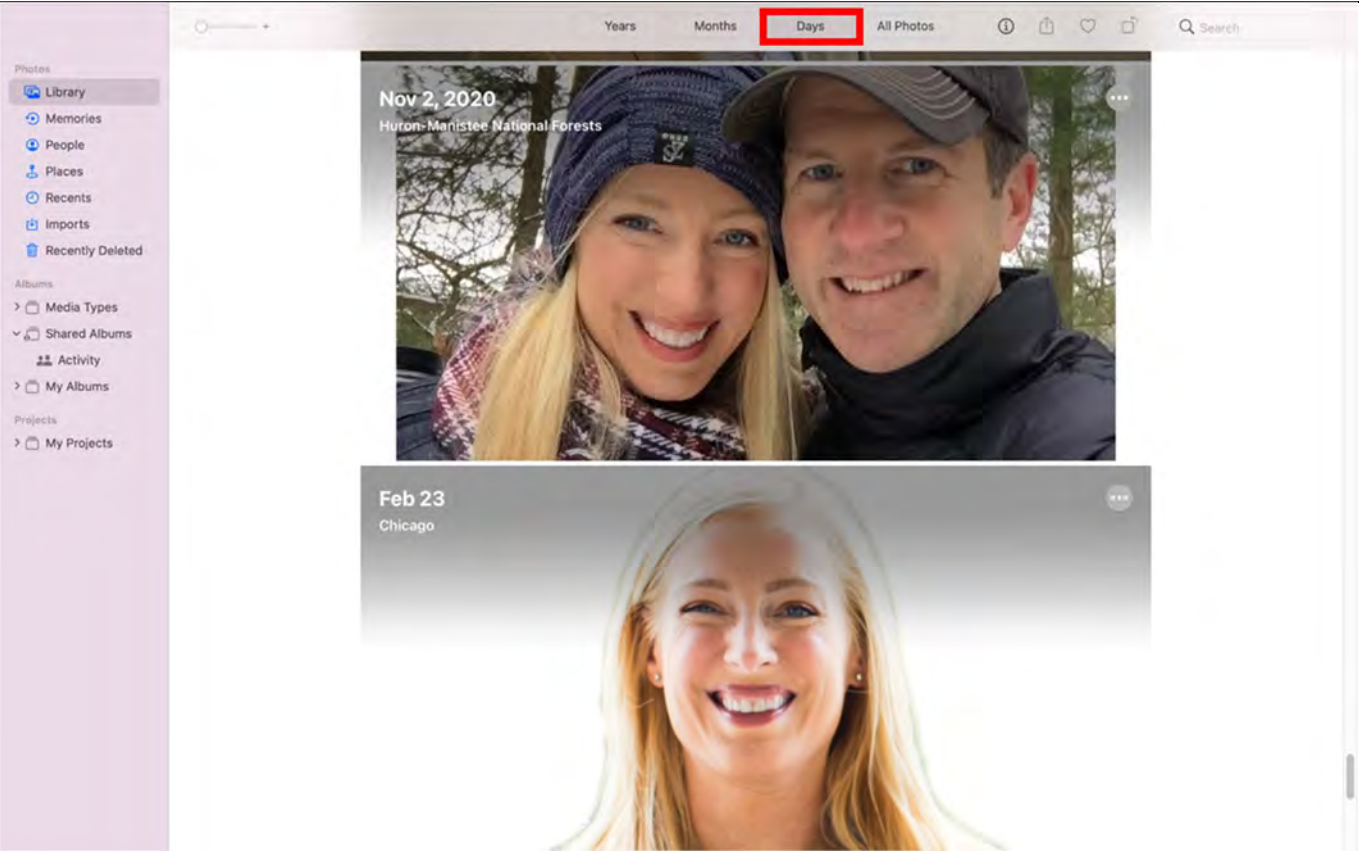
interactive timeline view permitting a user to group a plurality of digital files by year, month, and day.



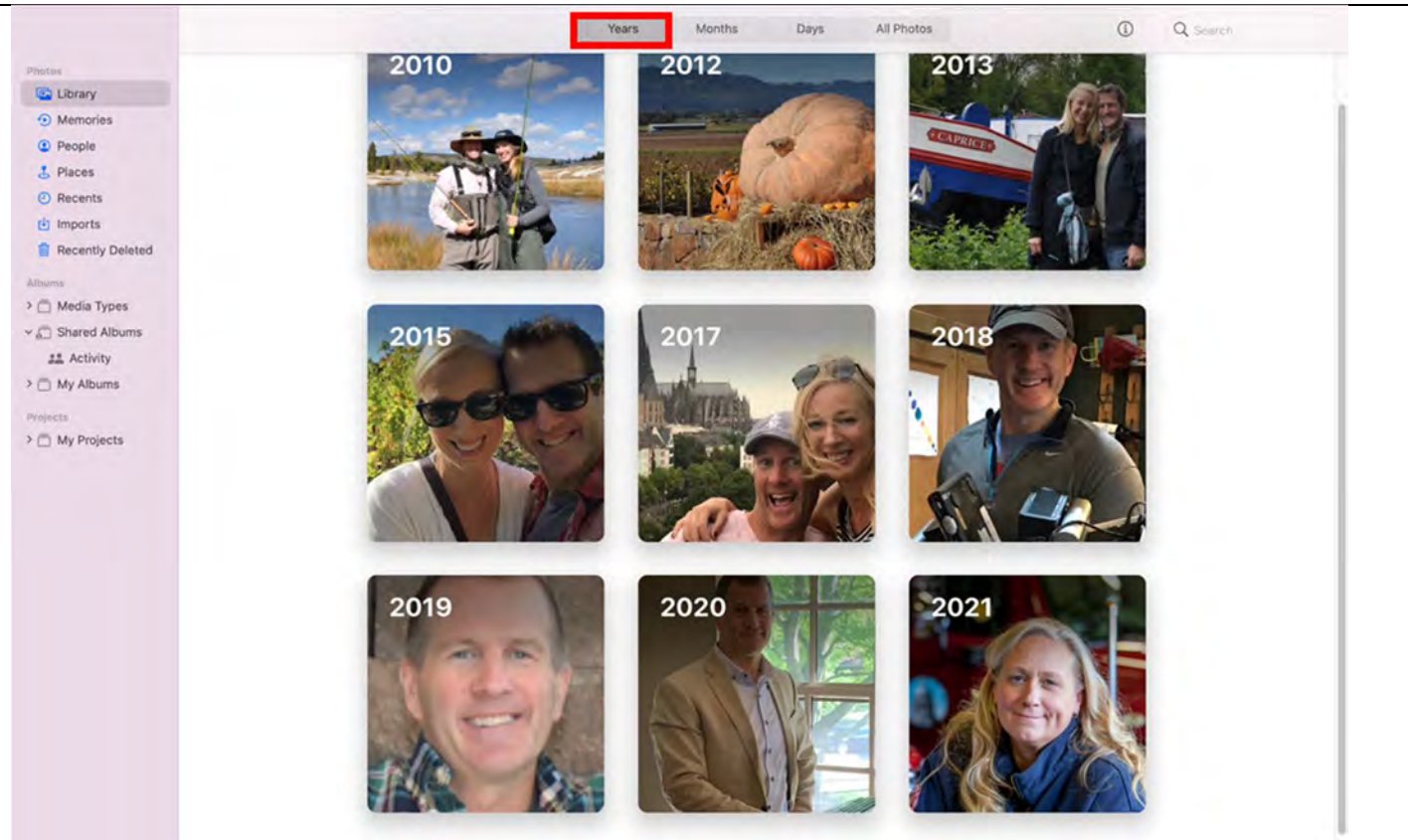
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<p><b>18<pre>pre]</pre></b> The method of claim 17, further comprising:</p>	<p><i>See</i> information for claim 17.</p>
<p><b>18<pre>a]</pre></b> responsive to receiving a year input, grouping the</p>	<p>Responsive to receiving a year input (e.g., 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>

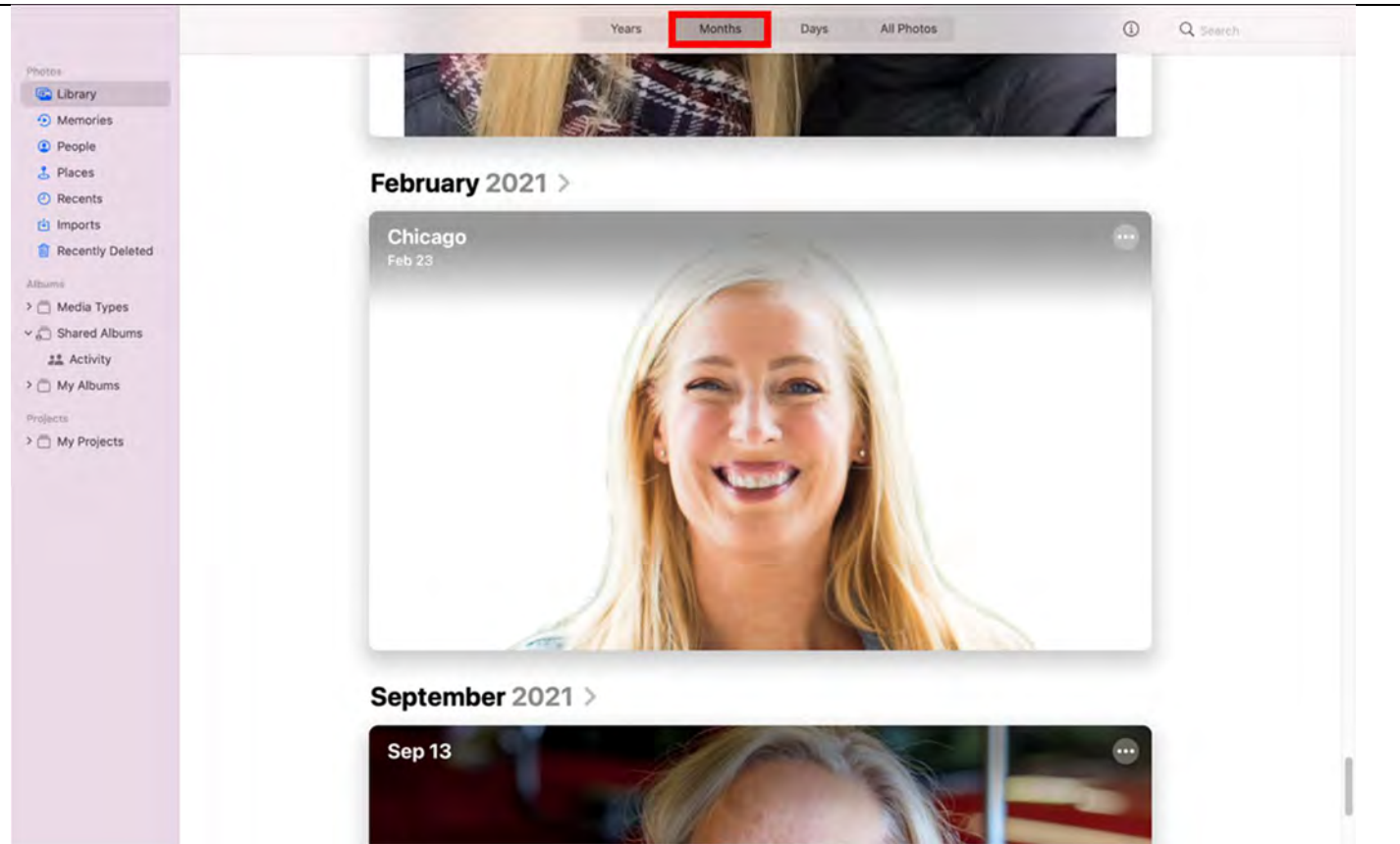
plurality of digital files based on year and causing at least one of the plurality of digital files to be displayed on the interface;



**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.

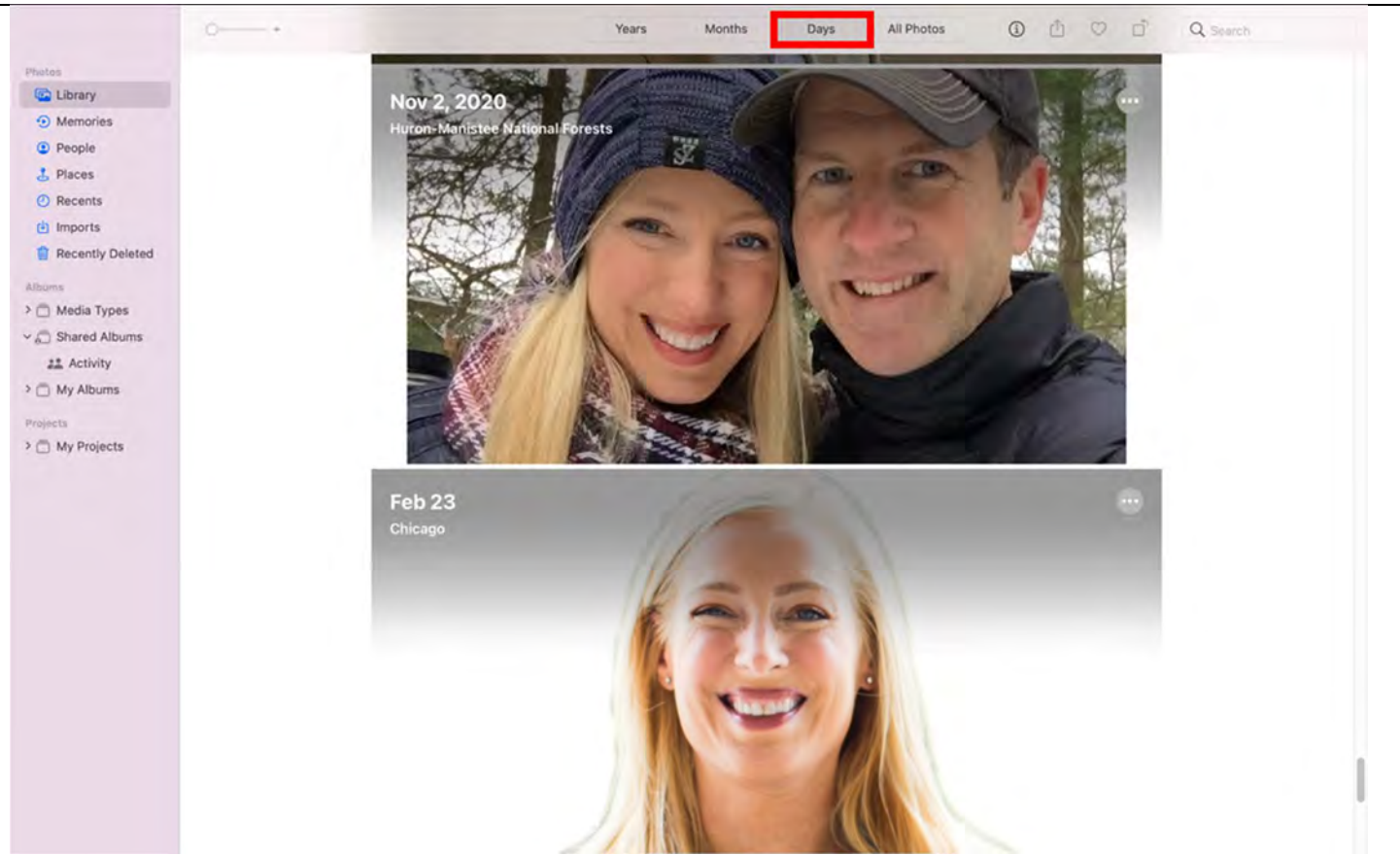
files to be displayed on the interface; and



**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.

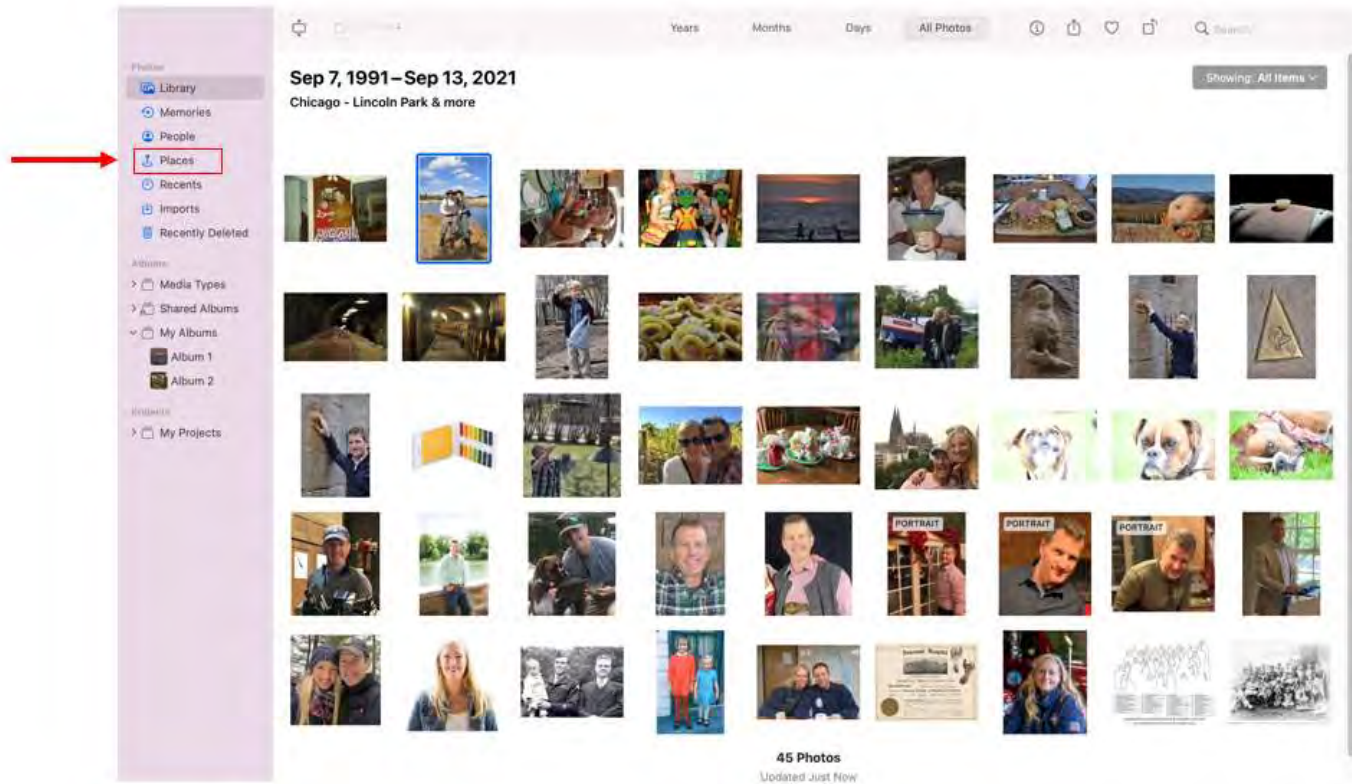
displayed on the interface.



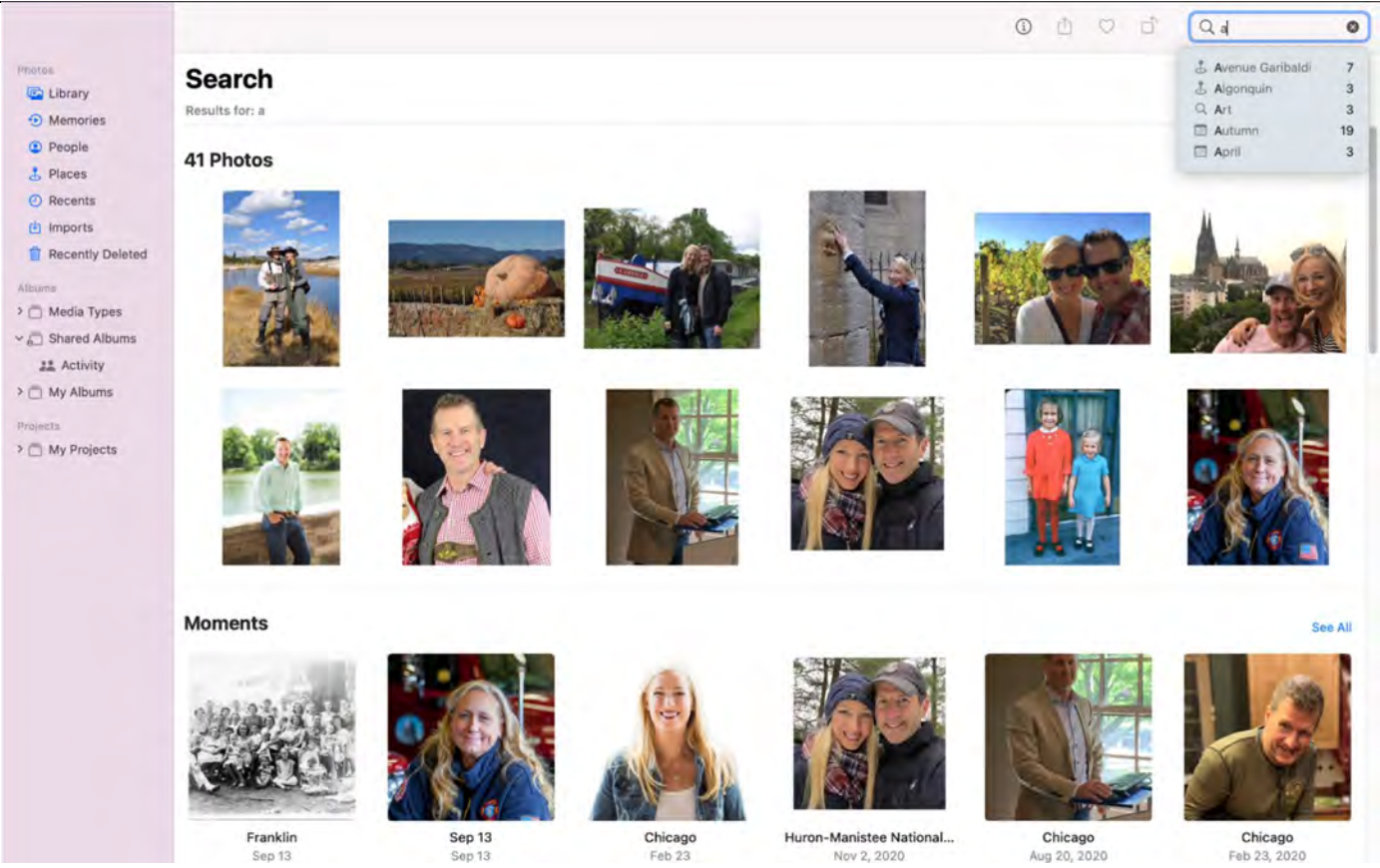
**19.** The method of claim 1, further comprising receiving one or more filtering criteria and causing one or more digital files

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.



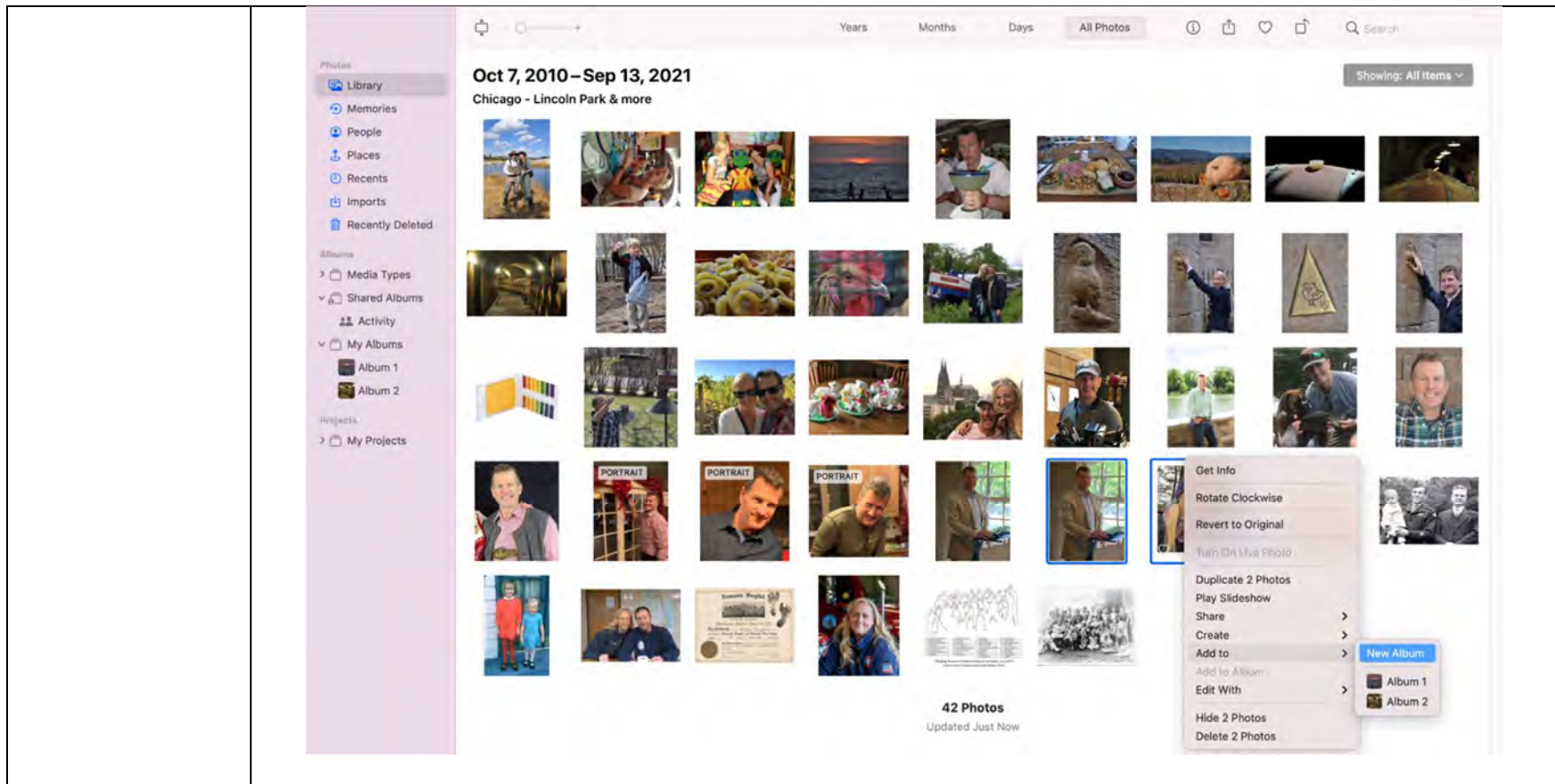
Further, macOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing the letter “a” as a filtering criterion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

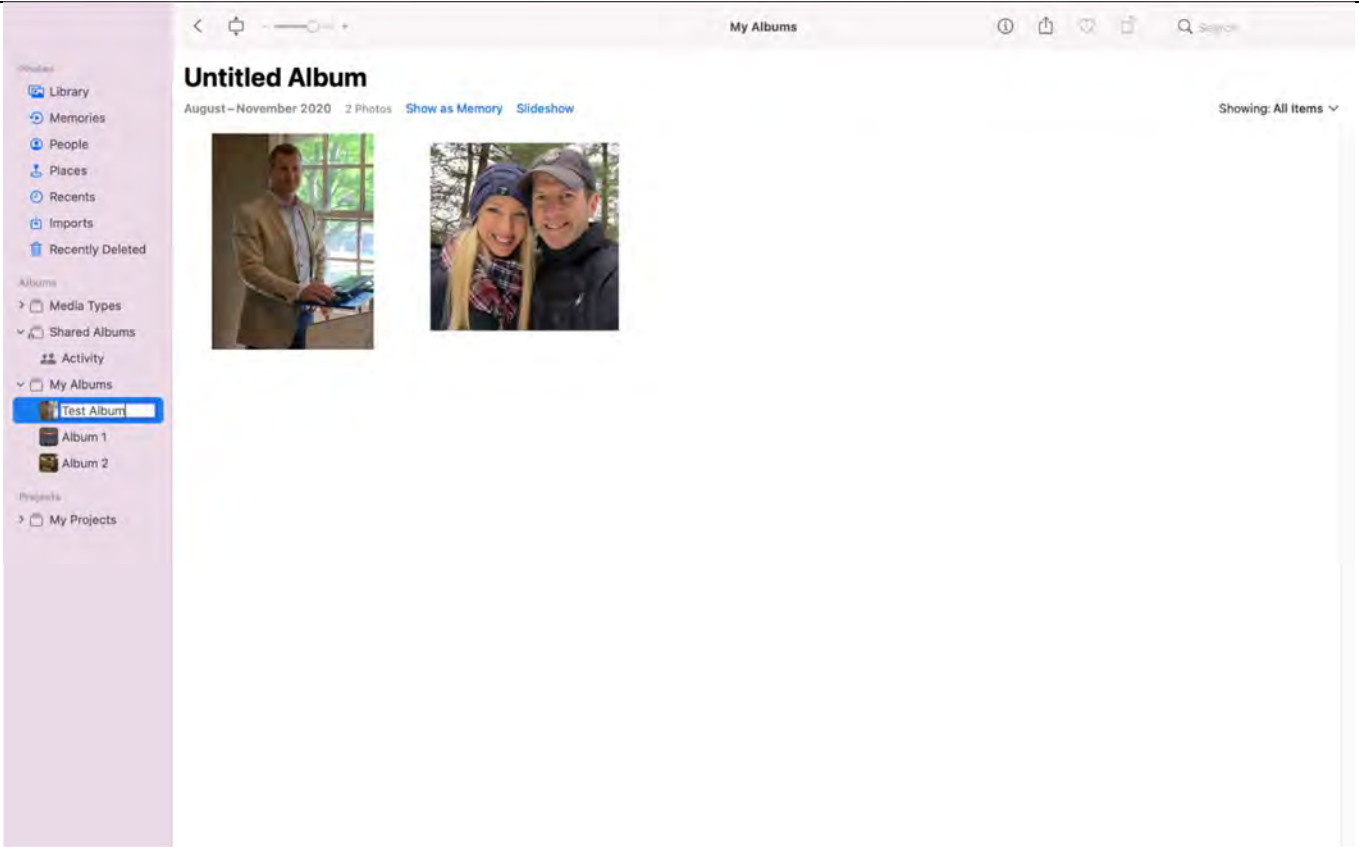


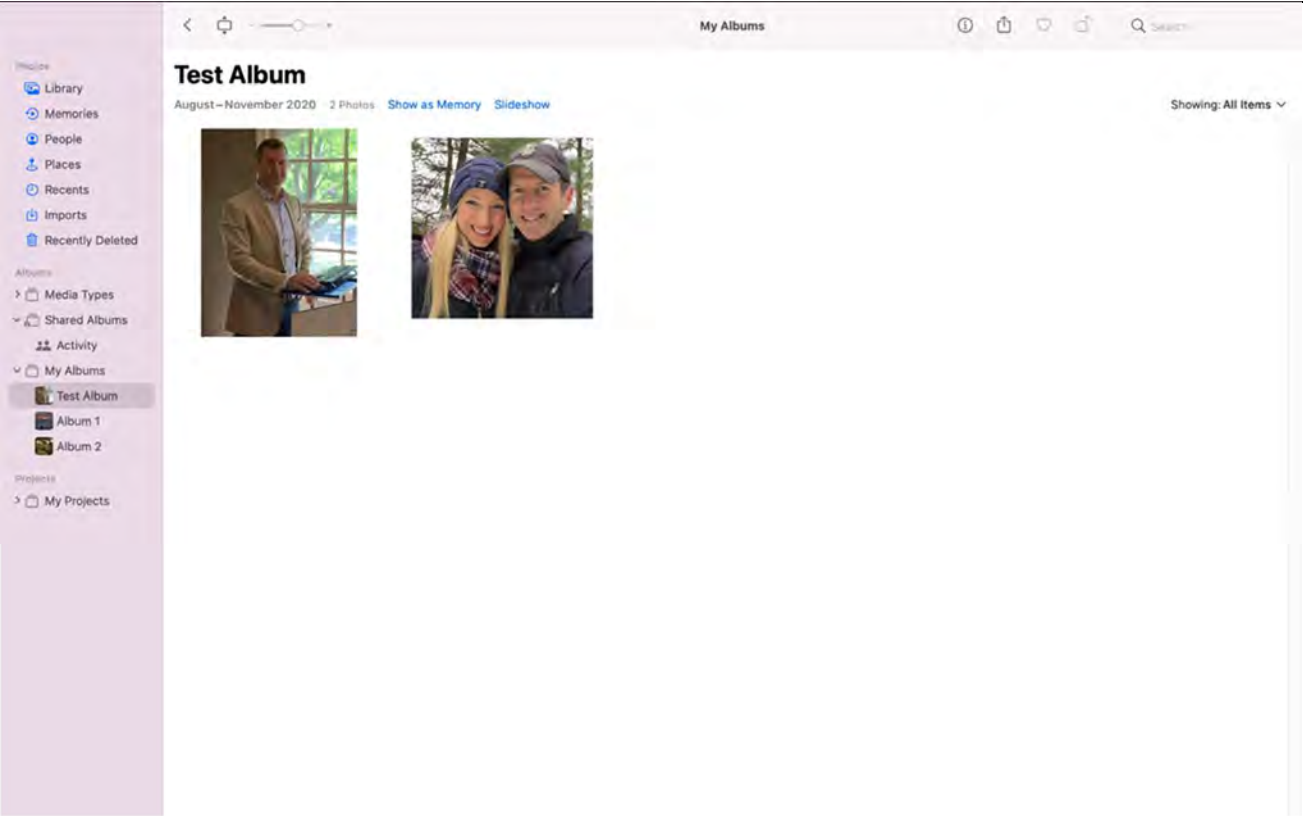


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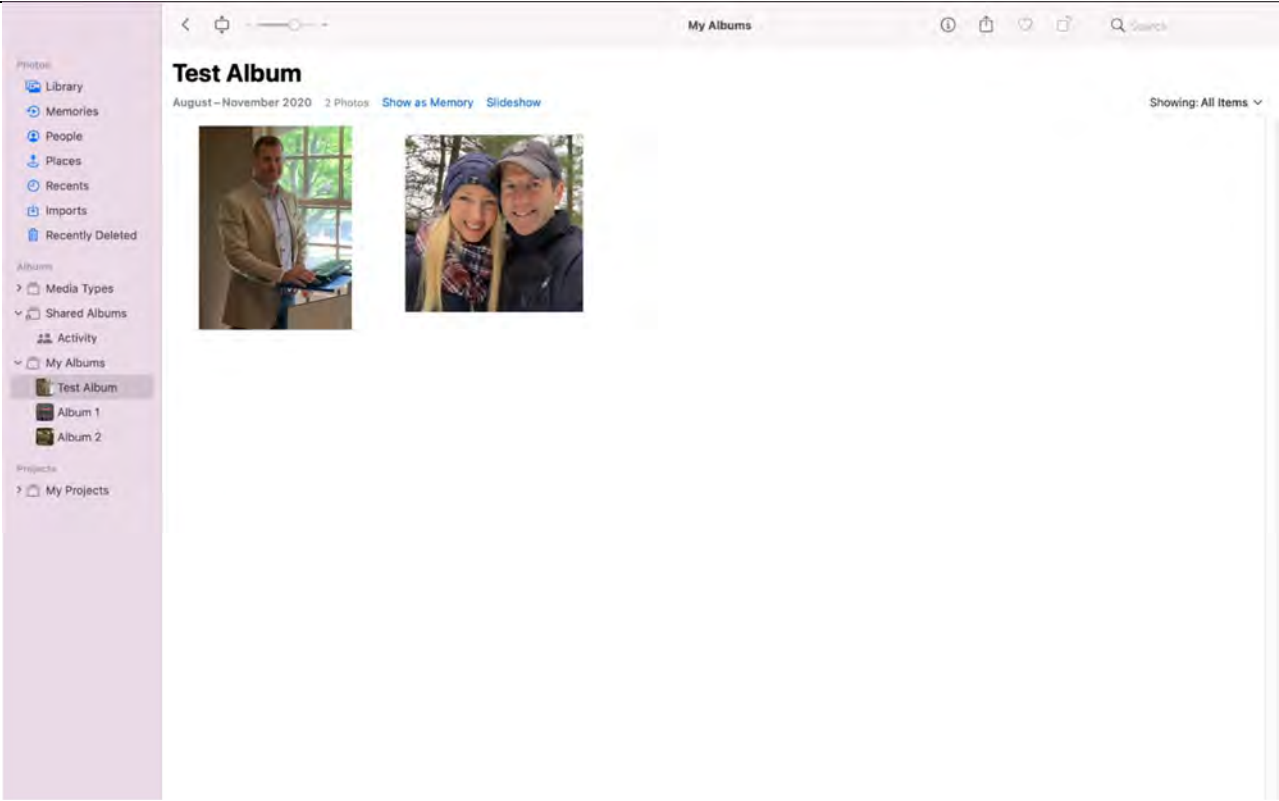


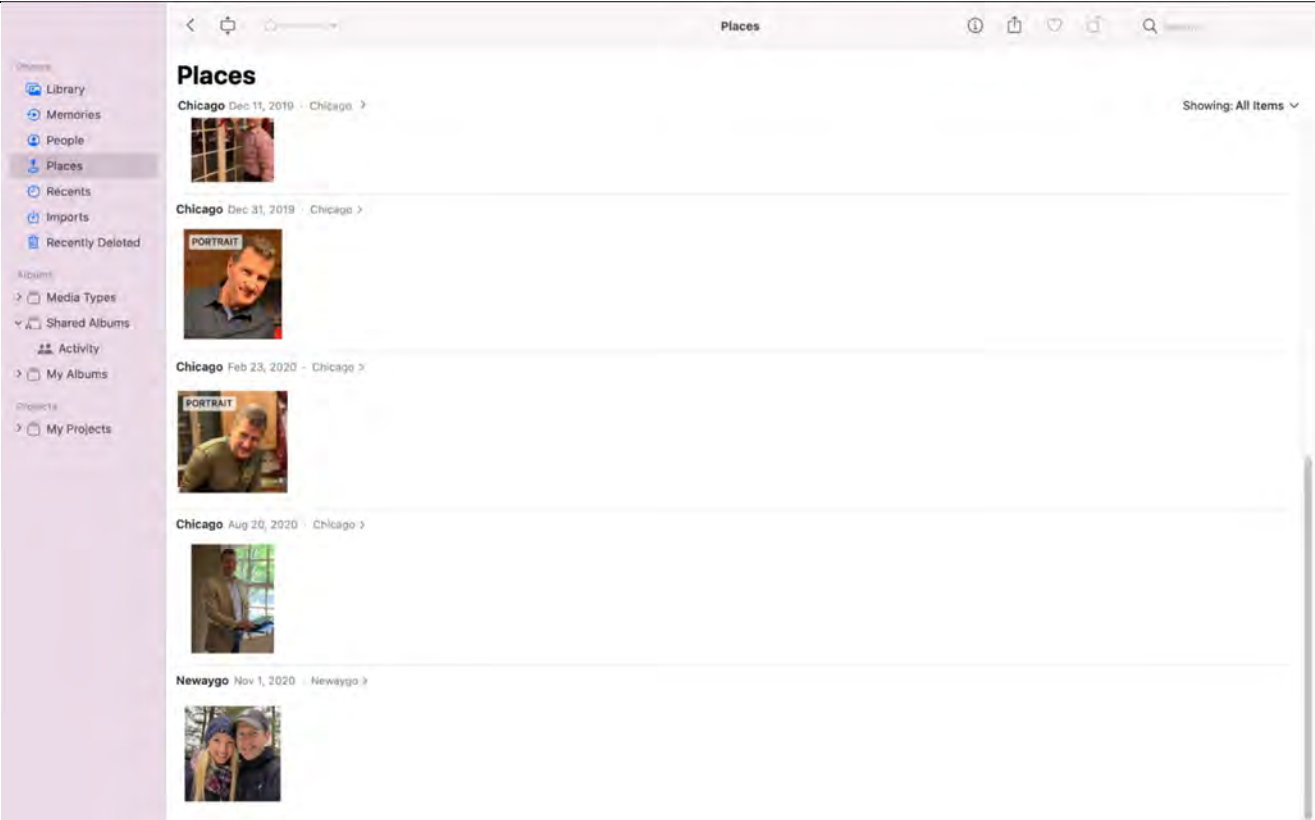
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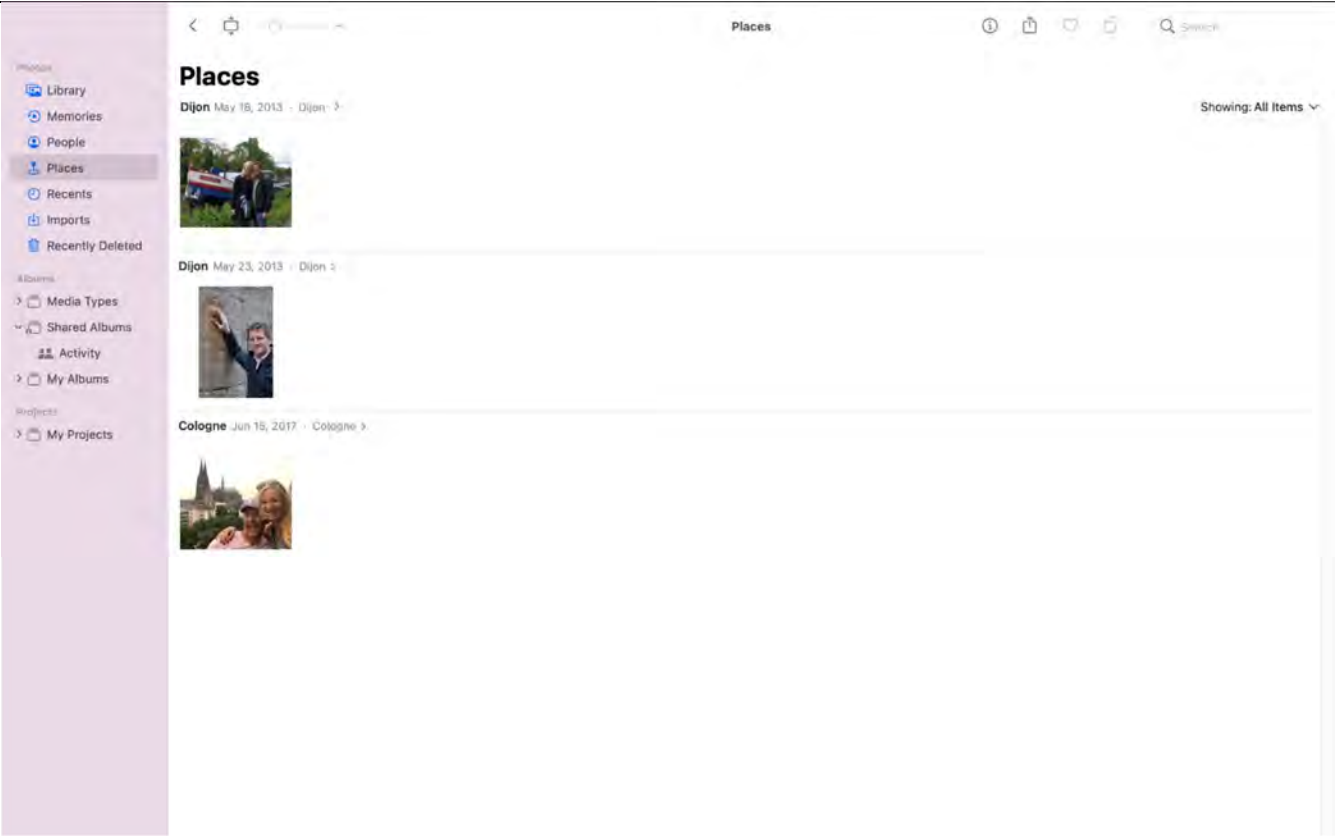
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places, Recents, Imports, Recently Deleted, Albums (with sub-options for Media Types, Shared Albums, Activity, My Albums, and Test Album), and Projects (with sub-option for My Projects). The 'Test Album' is highlighted. The main window 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 of the window shows 'My Albums' and a search bar. The bottom right indicates 'Showing: All Items'.</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 app 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 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>

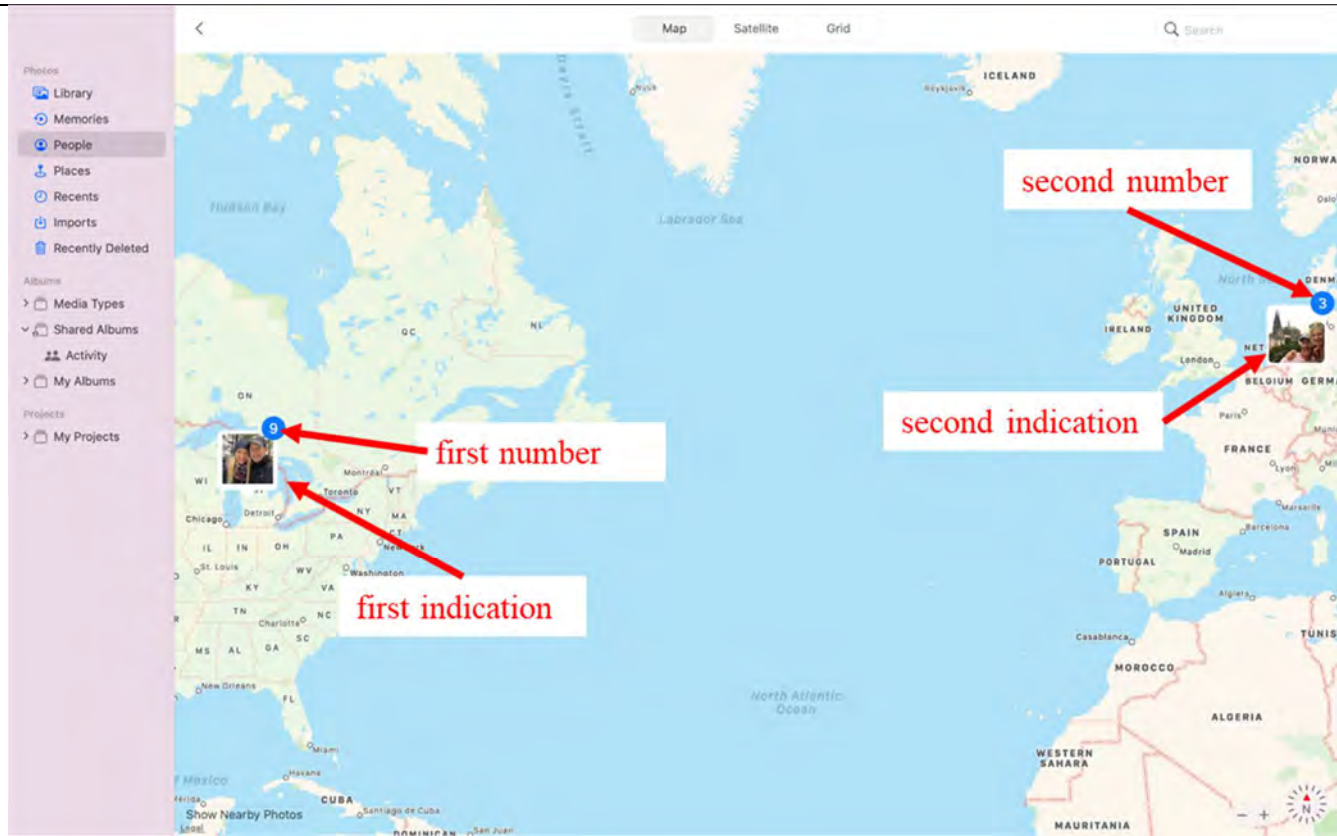
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	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and 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>

<p>to be displayed on the interface and</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, causing the first set of digital files to be displayed on the interface.</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. 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 red and white striped shirt. 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 top right of the main area shows 'Showing: All Items' and a search bar.</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.

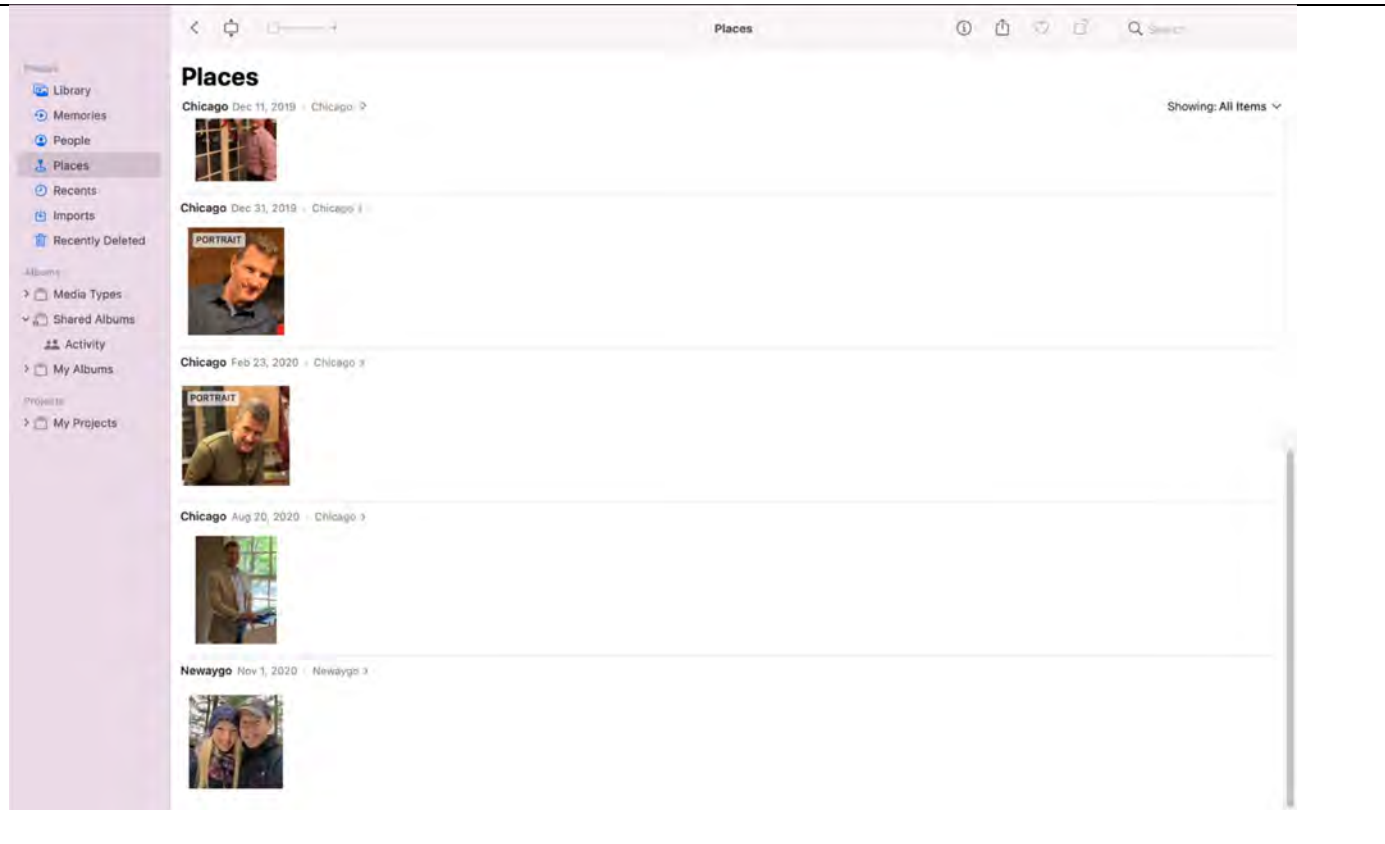


**23.** The method of claim 3, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

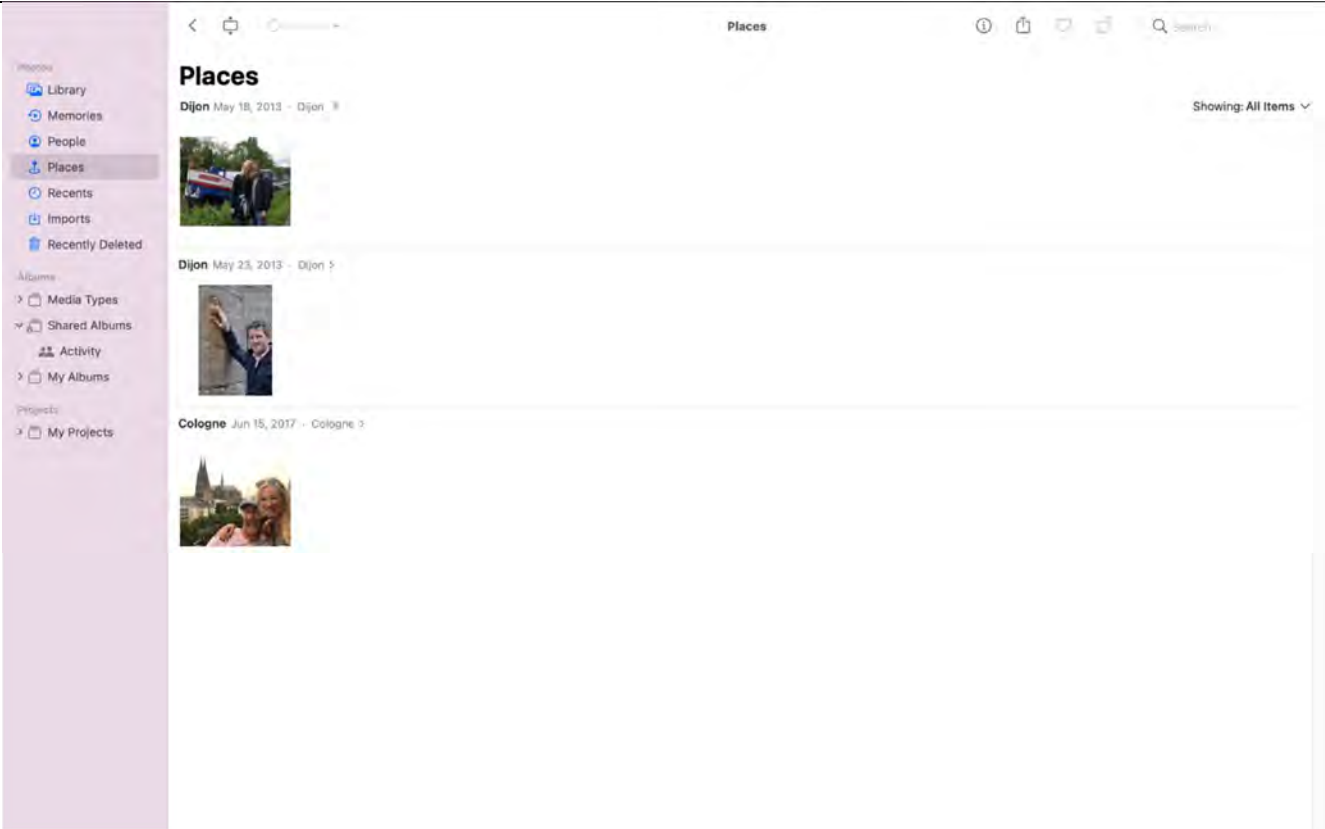
Each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files include a photo, a video, or both.



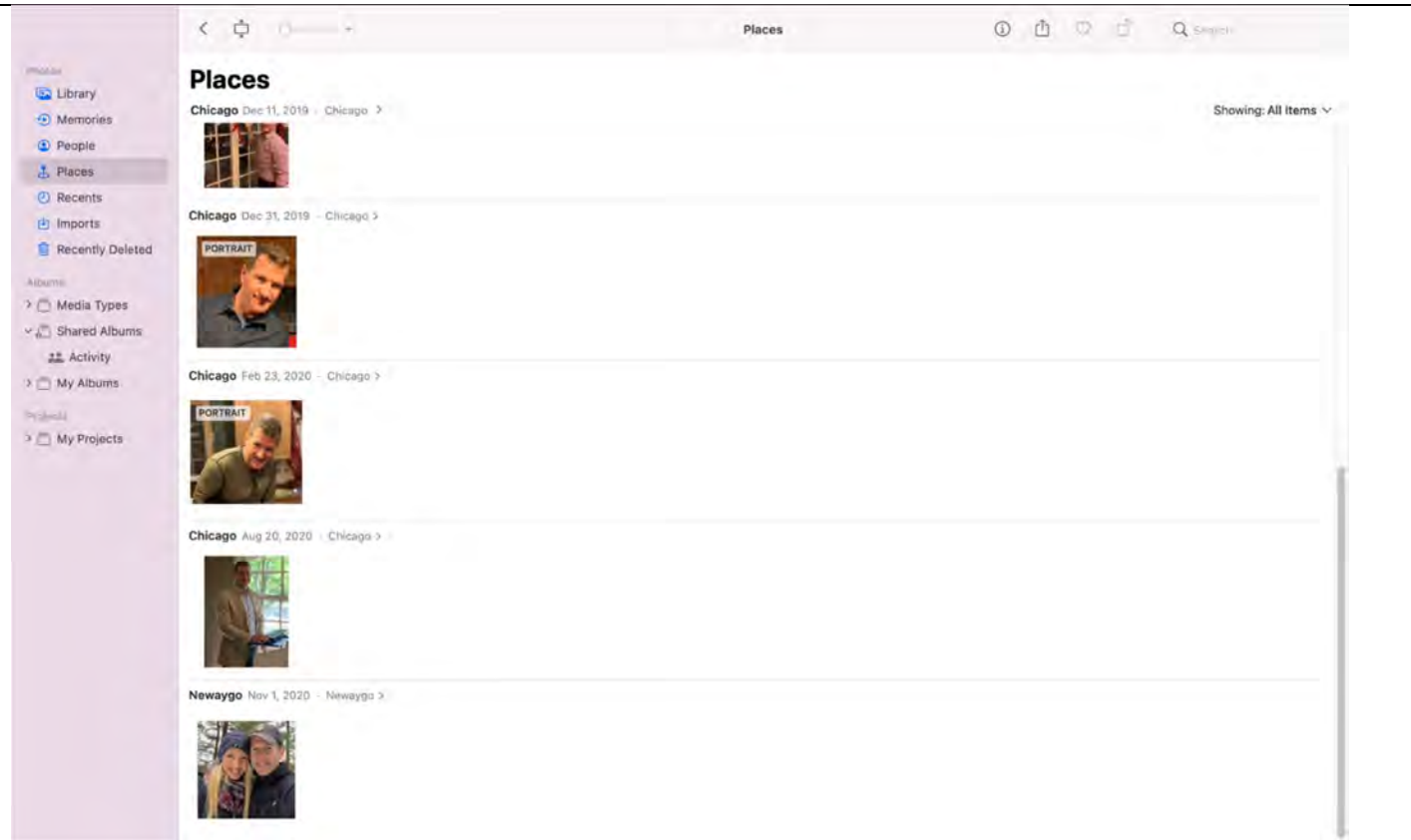
include a photo, a video, or both.



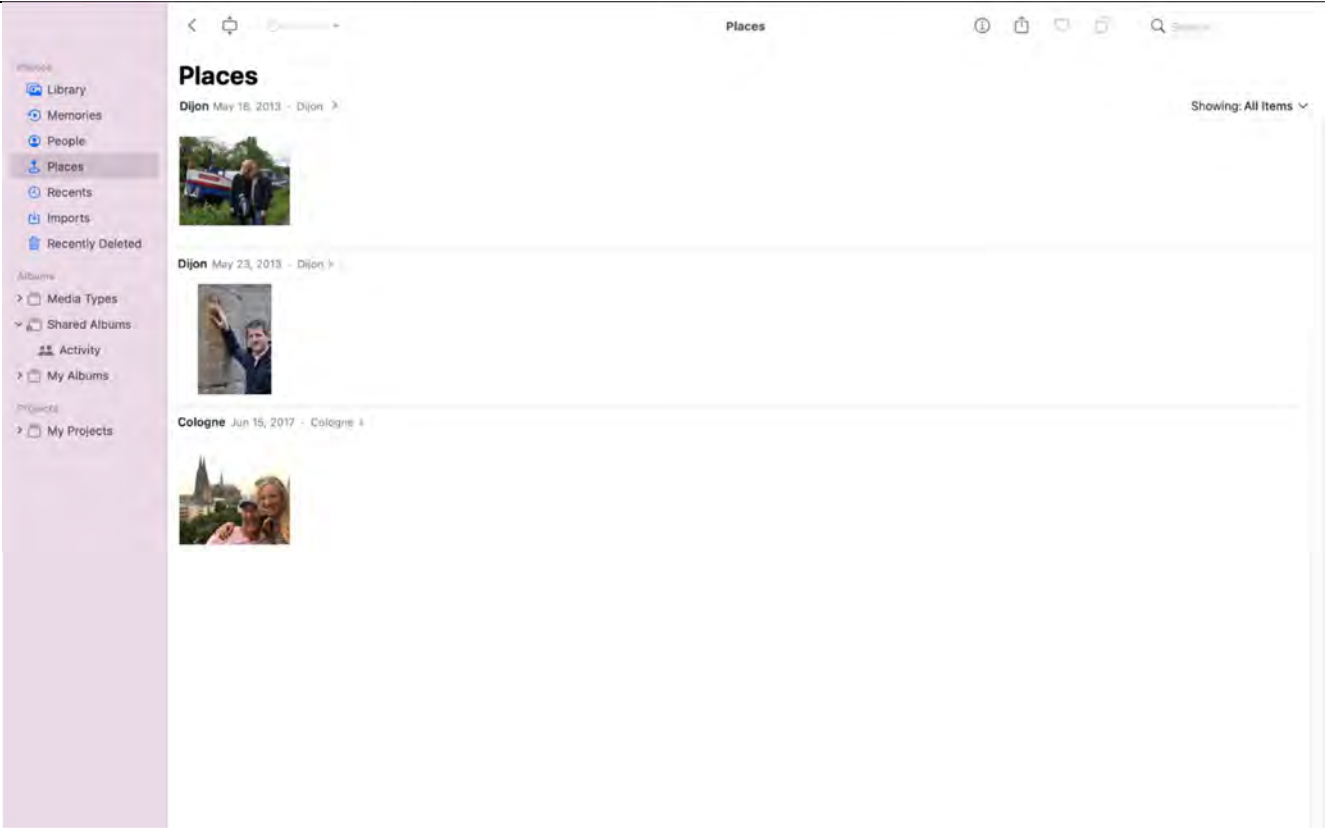
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<p><b>25[pre]</b> The method of claim 21,</p>	<p><i>See information for claim 21.</i></p>
<p><b>25[a]</b> wherein at least one digital file in the first set of digital files displayed on the interface</p>	<p>At least one digital file in the first set 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>

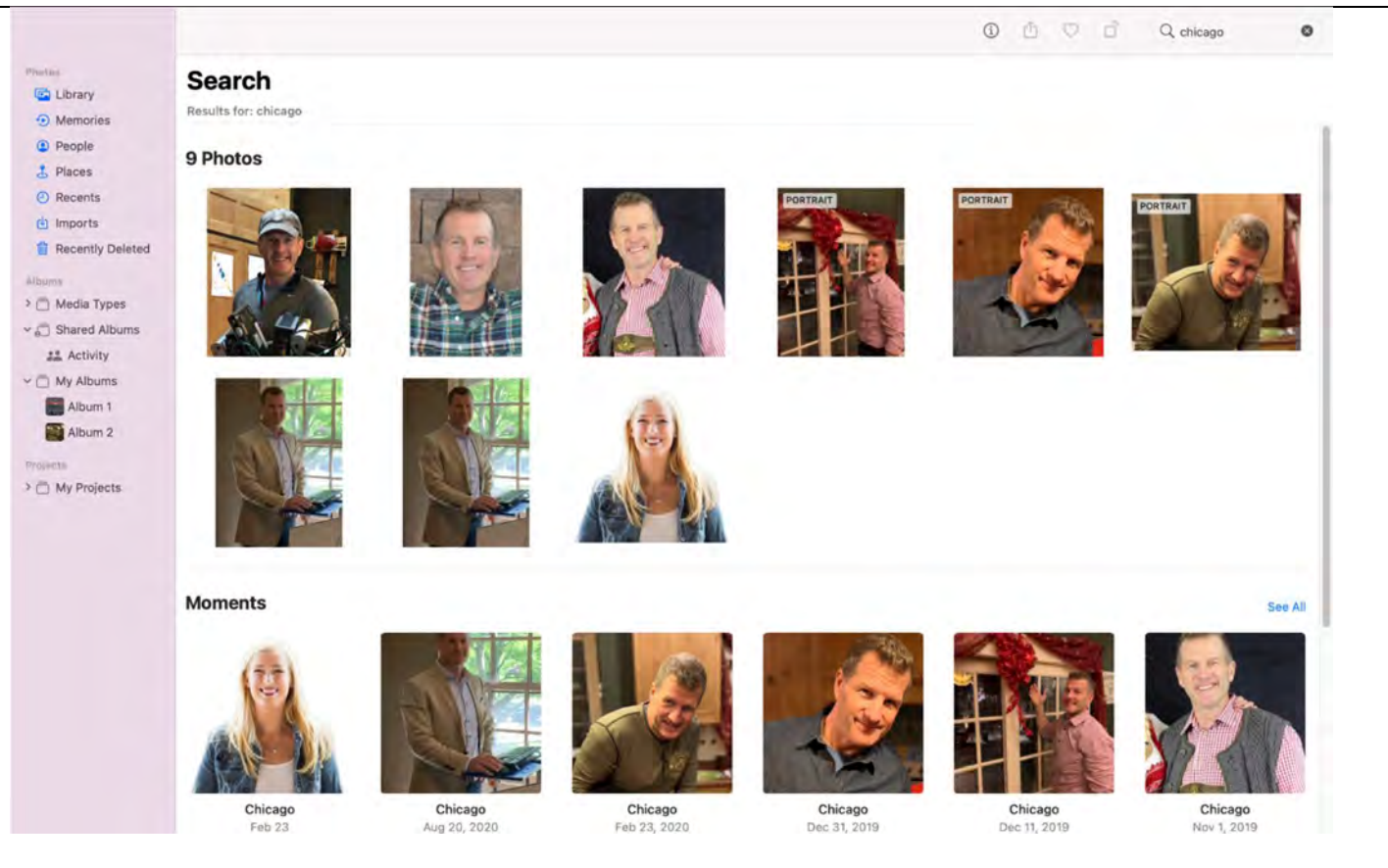
responsive to the selection associated with the first location is not overlaid on the interactive geographic map and

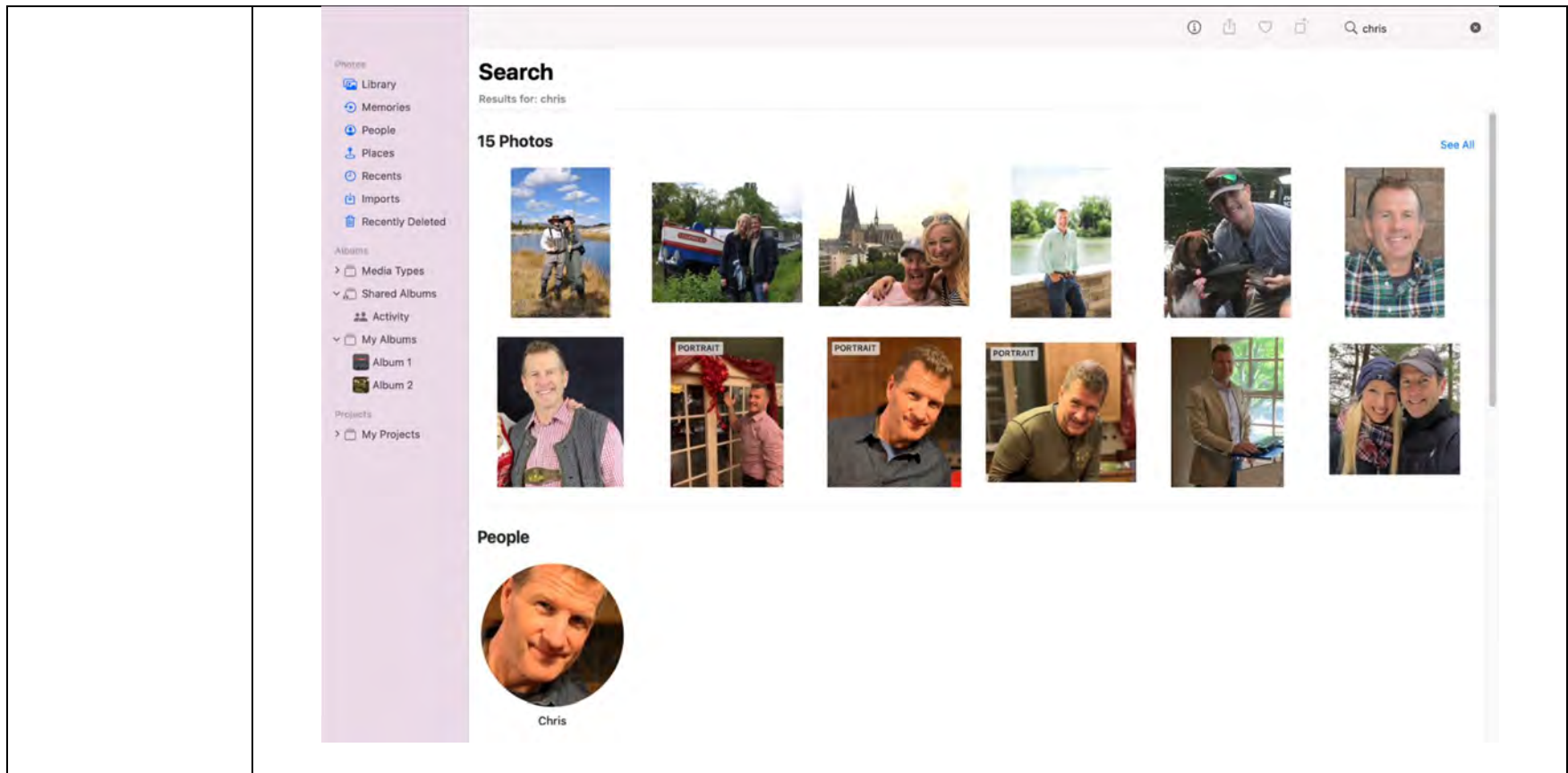


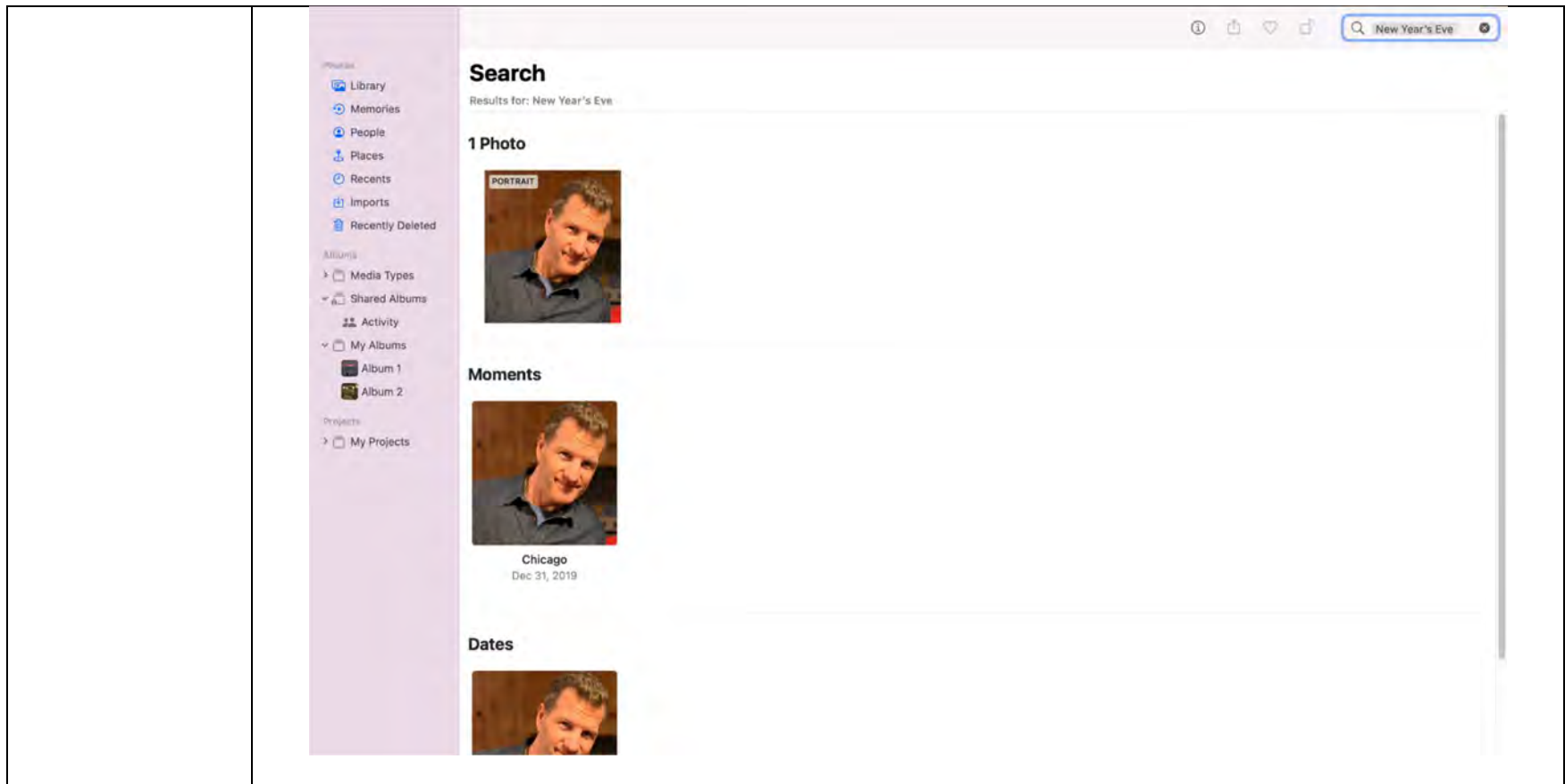
**25[b]** at least one digital file in the second set of digital files displayed on the interface responsive to the selection associated with the second location

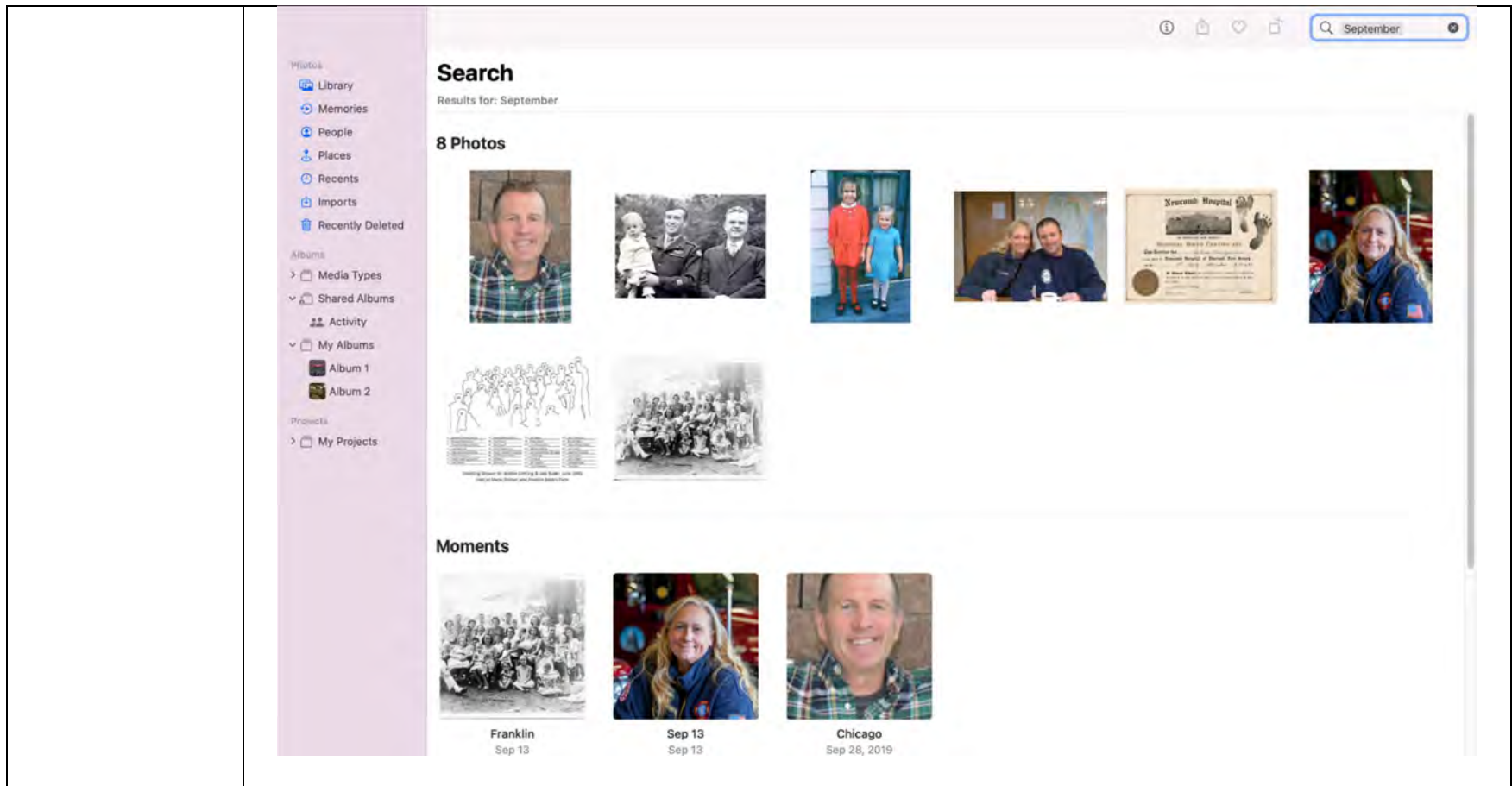
<p>are not overlaid on the interactive geographic map.</p>	
<p><b>26.</b> The method of claim 19, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a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

combination thereof.

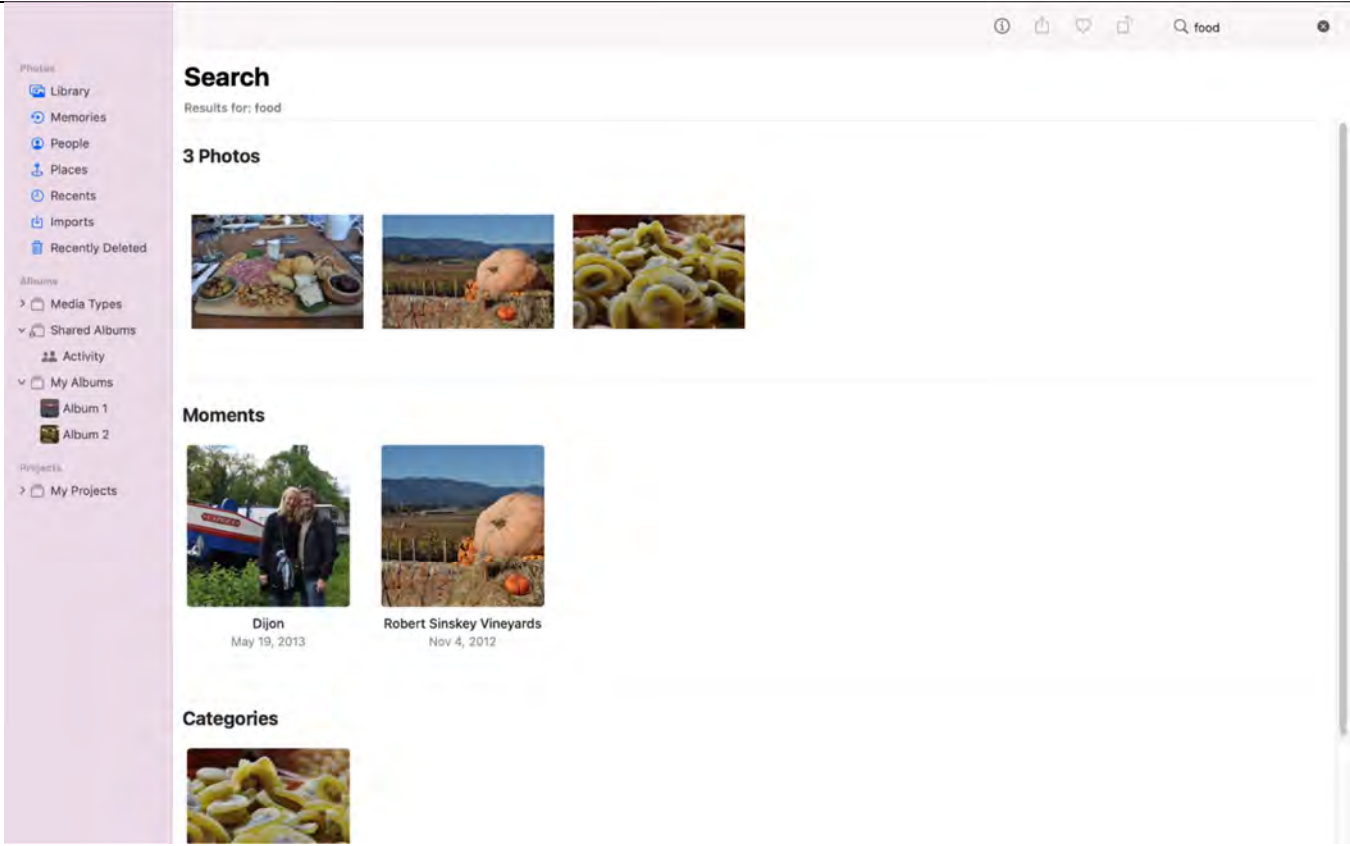




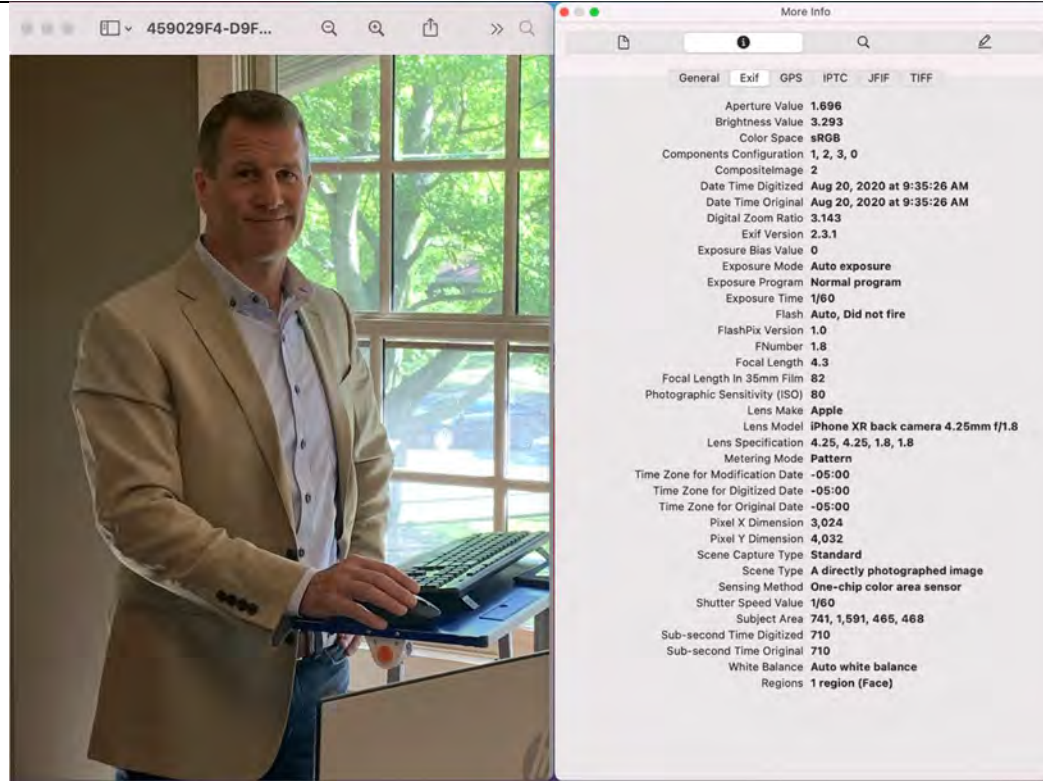






	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with navigation options: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area displays search 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 showing the same 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.

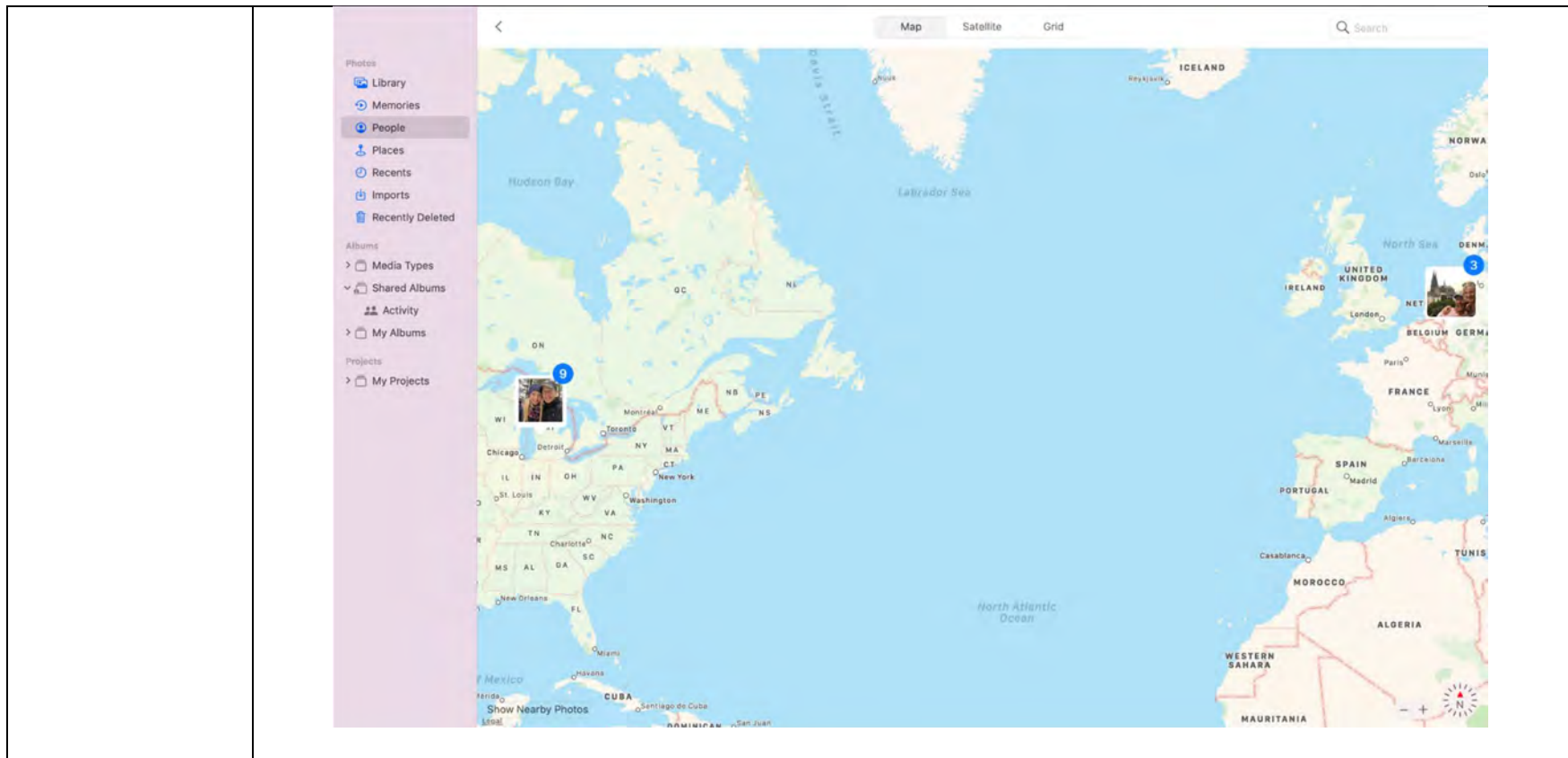


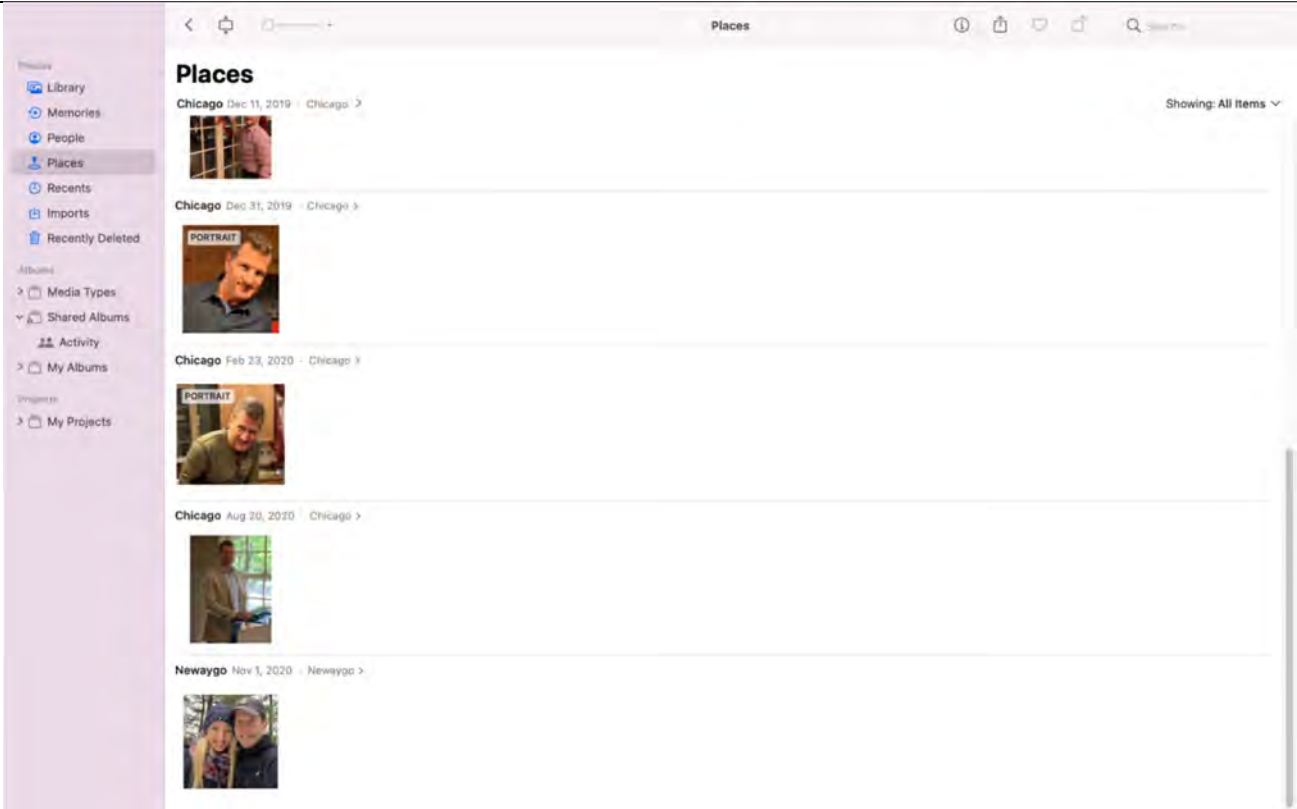
**28.** The method of claim 1, wherein the input that is indicative of the selection of the first person includes a touch or click of the first thumbnail image

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>

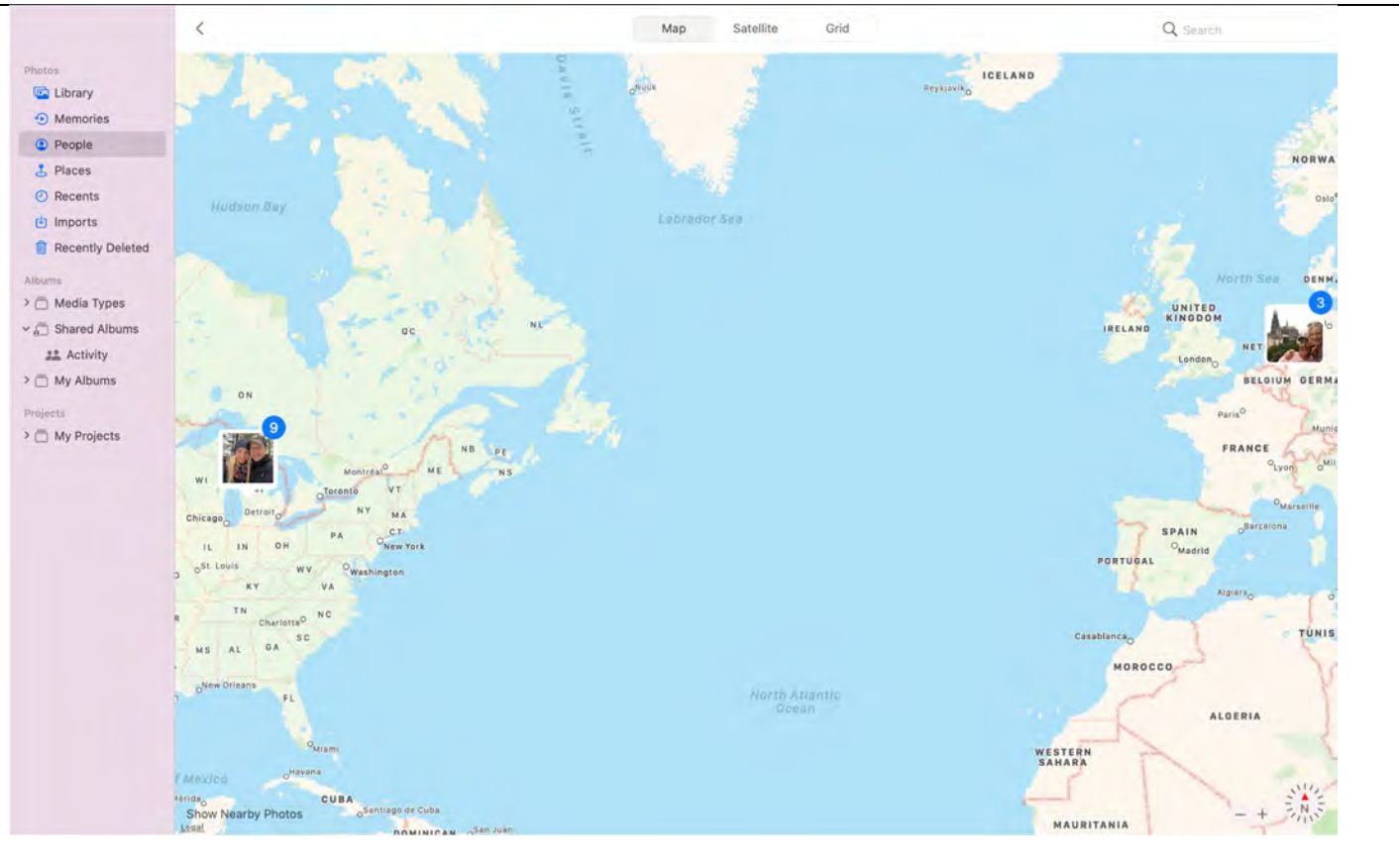
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS



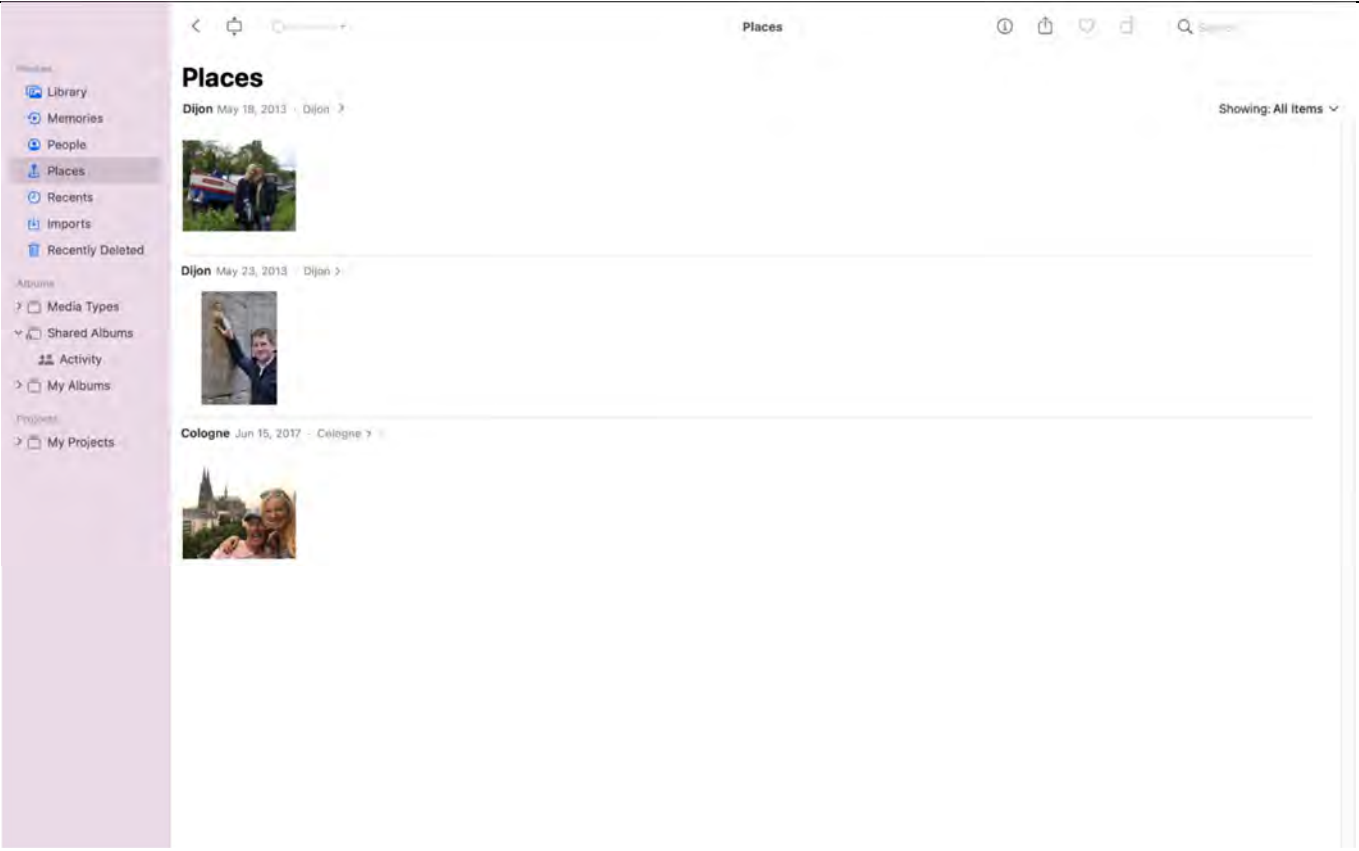
	
<p><b>30[b]</b> each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the second location</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated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

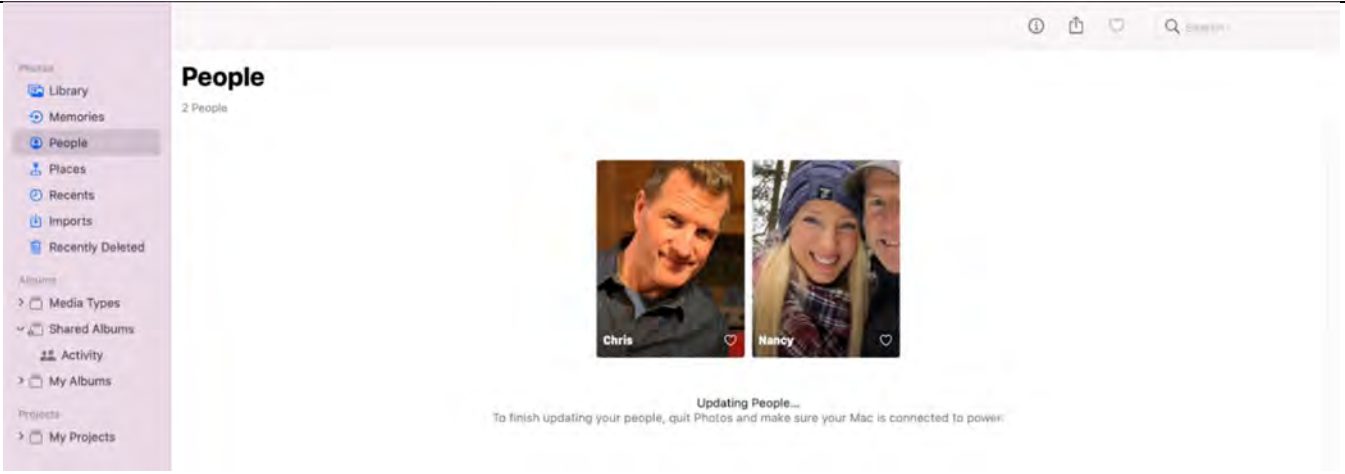
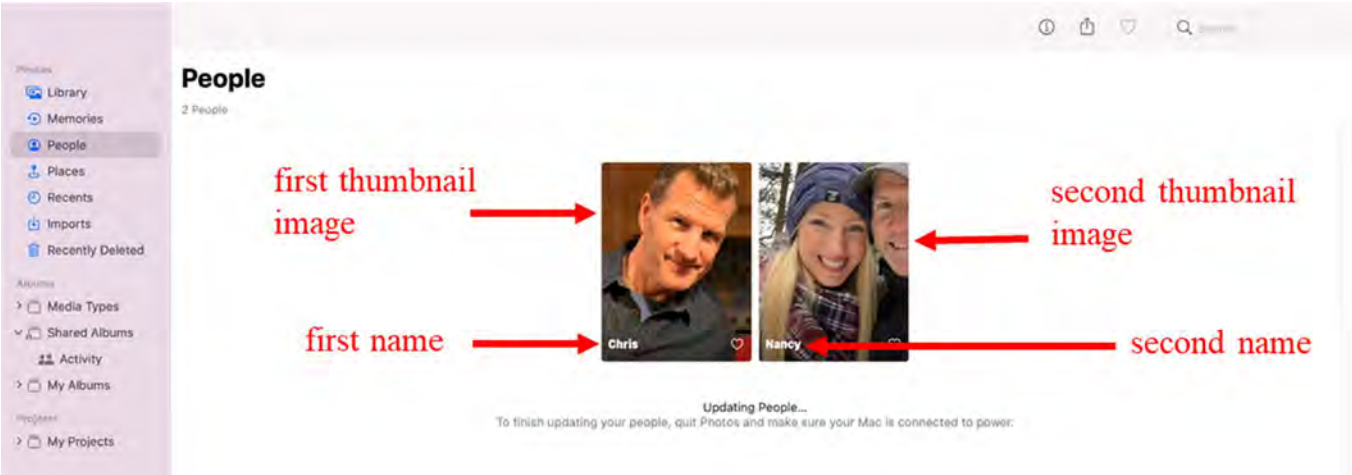
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

are not overlaid on the interactive geographic map.



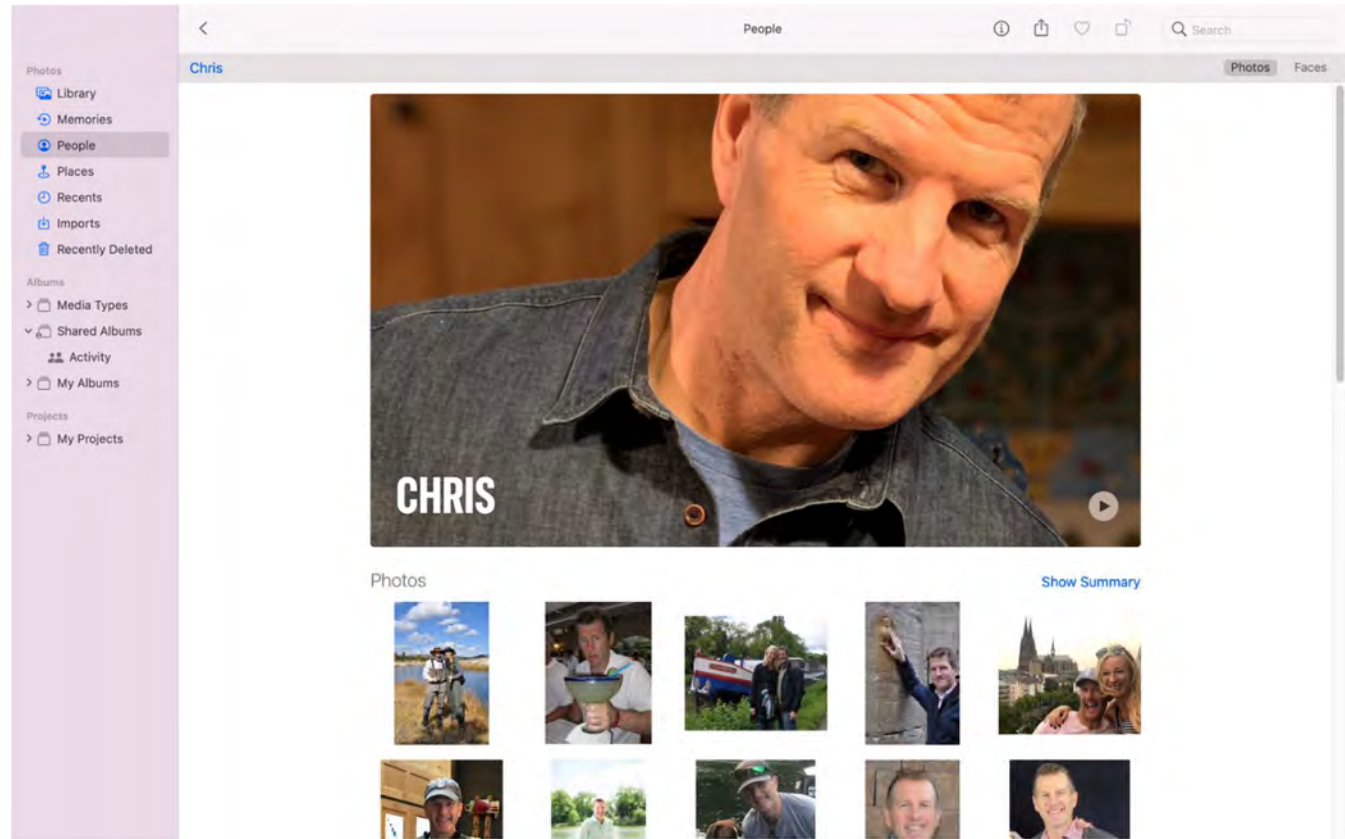
Initial Infringement Contentions – U.S. Patent No. 11,017,020 - macOS

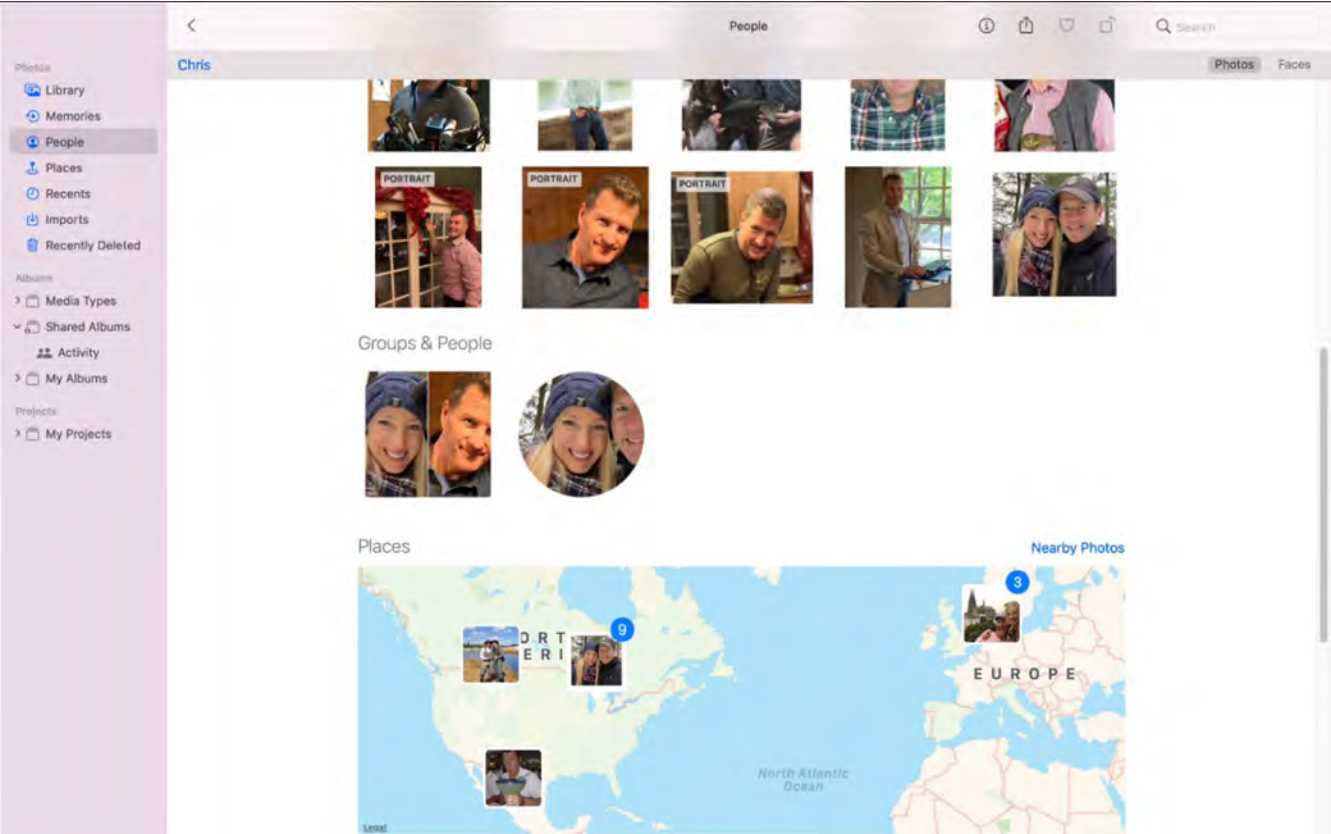
	
<p><b>31[pre]</b> A method comprising:</p>	<p>To the extent the preamble is limiting, macOS performs a method, as set forth below.</p>
<p><b>31[a]</b> causing an interface to display a people view, the people view including:</p>	<p>macOS causes an interface (e.g., Apple iPad) to display a people view.</p>

	 <p>The screenshot shows the 'People' view in the Photos app. 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 '2 People'. There are two thumbnail images: one of a man labeled 'Chris' and one of a woman labeled 'Nancy'. Below the thumbnails, there is a status bar that says 'Updating People...' and a note: 'To finish updating your people, quit Photos and make sure your Mac is connected to power.'</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 shows the same 'People' view as above. Red arrows point from text labels to the corresponding elements in the interface: 'first thumbnail image' points to the image of Chris, 'first name' points to the name 'Chris', 'second thumbnail image' points to the image of Nancy, and 'second name' points to the name 'Nancy'.</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>

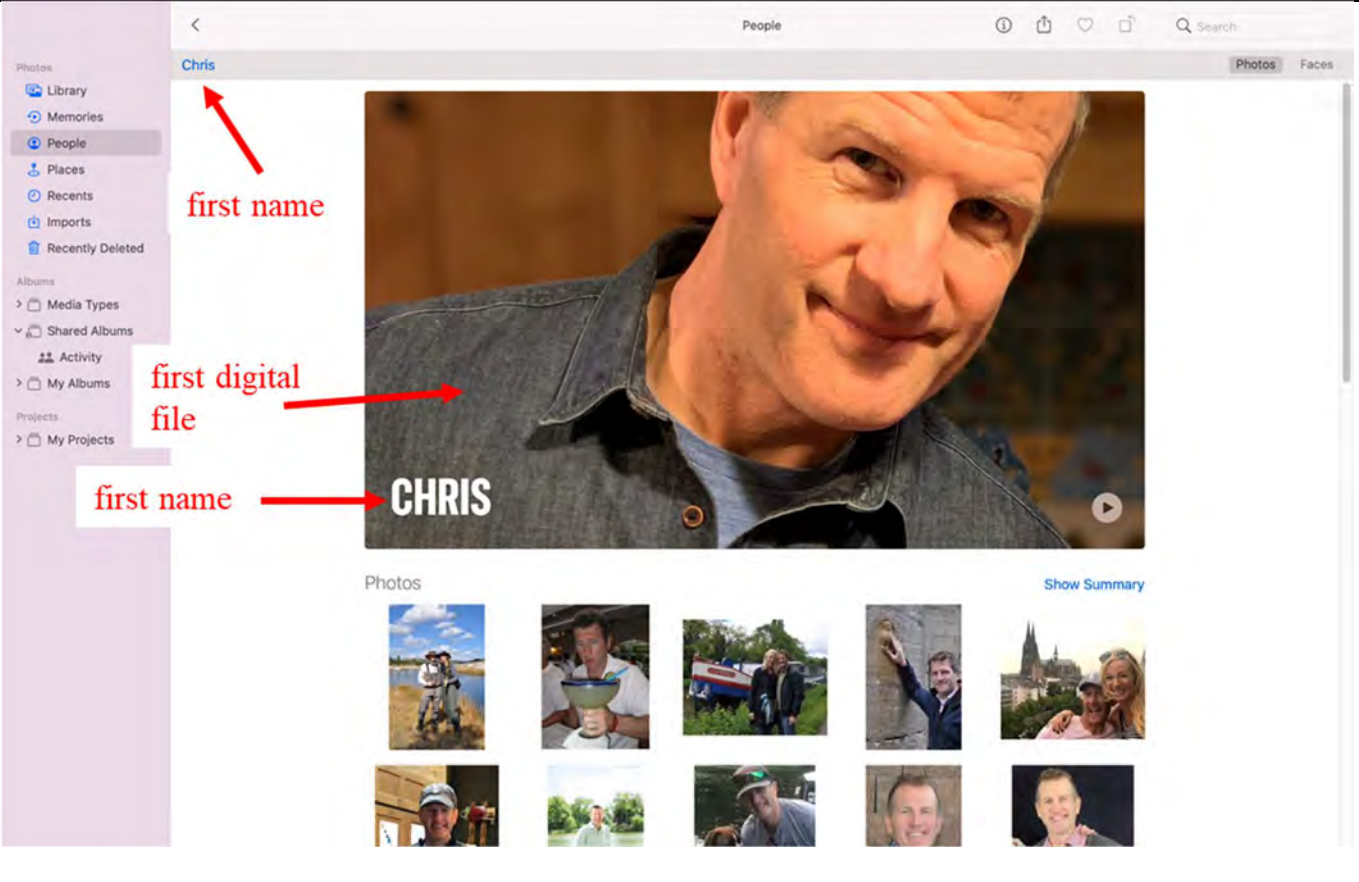


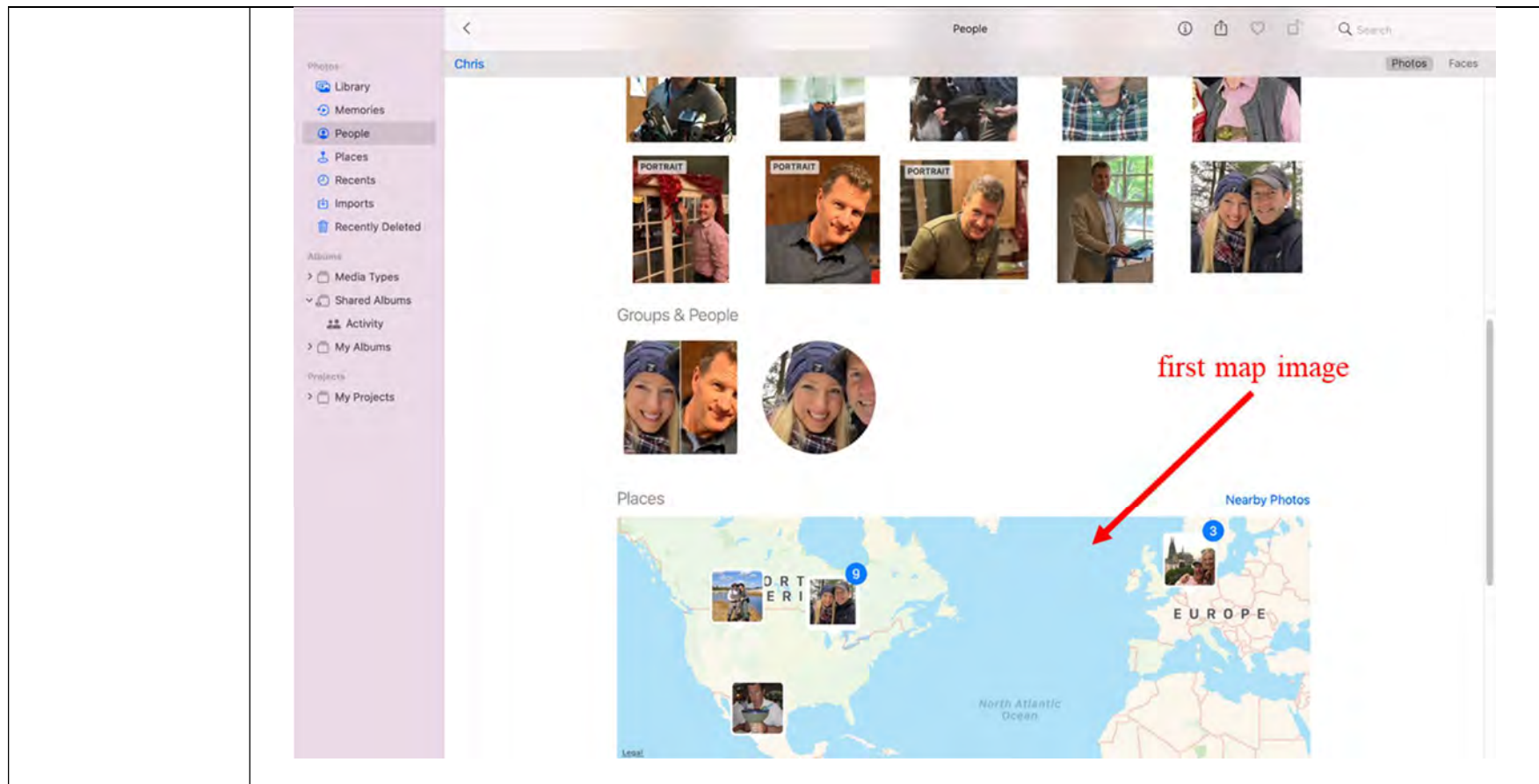
indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including:



	
<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>

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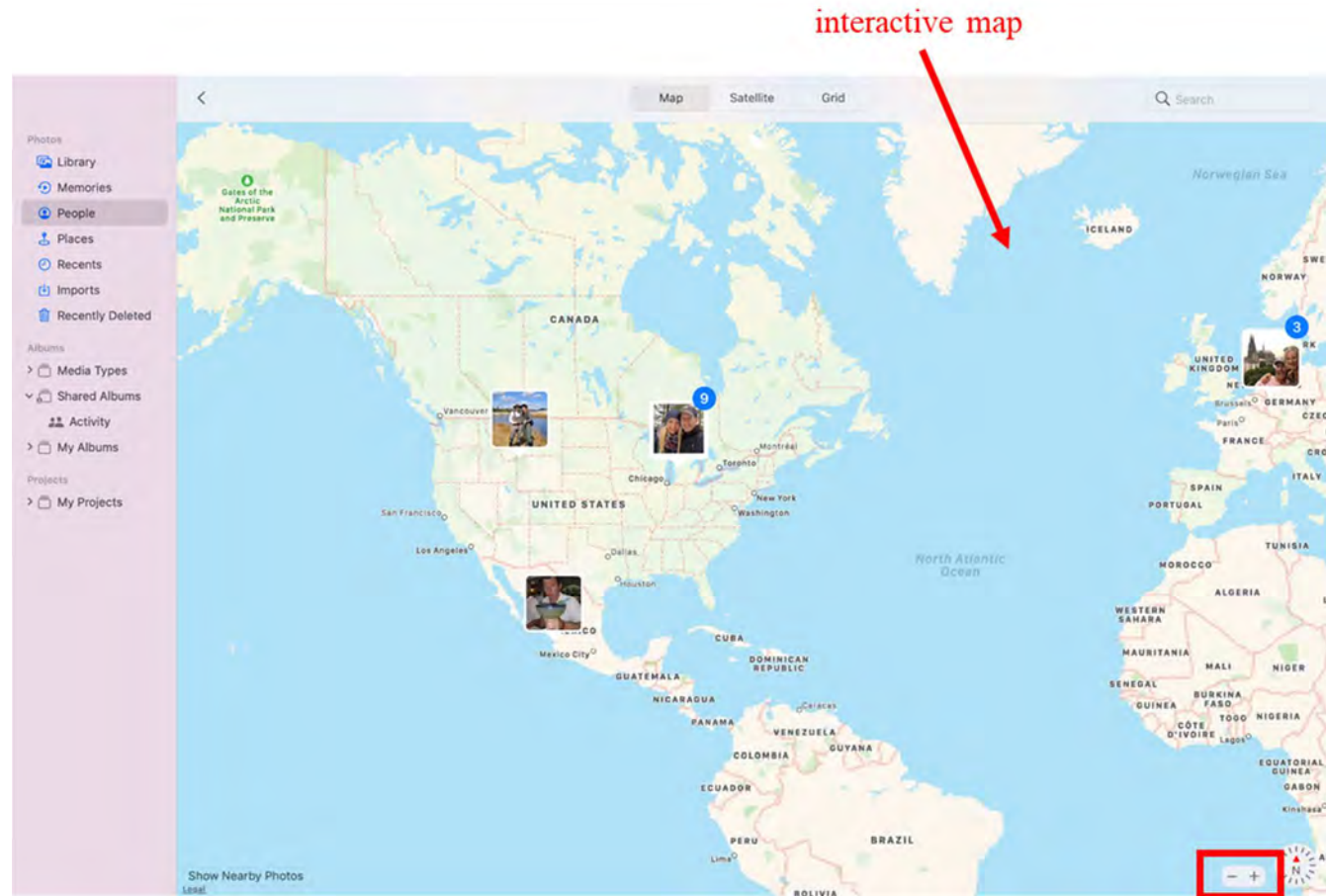
	 <p>The screenshot shows the macOS Photos app interface. On the left is a sidebar with categories: Photos (Library, Memories, People, Places, Recents, Imports, Recently Deleted), Albums (Media Types, Shared Albums, Activity, My Albums), and Projects (My Projects). The main area is titled 'People' and 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.

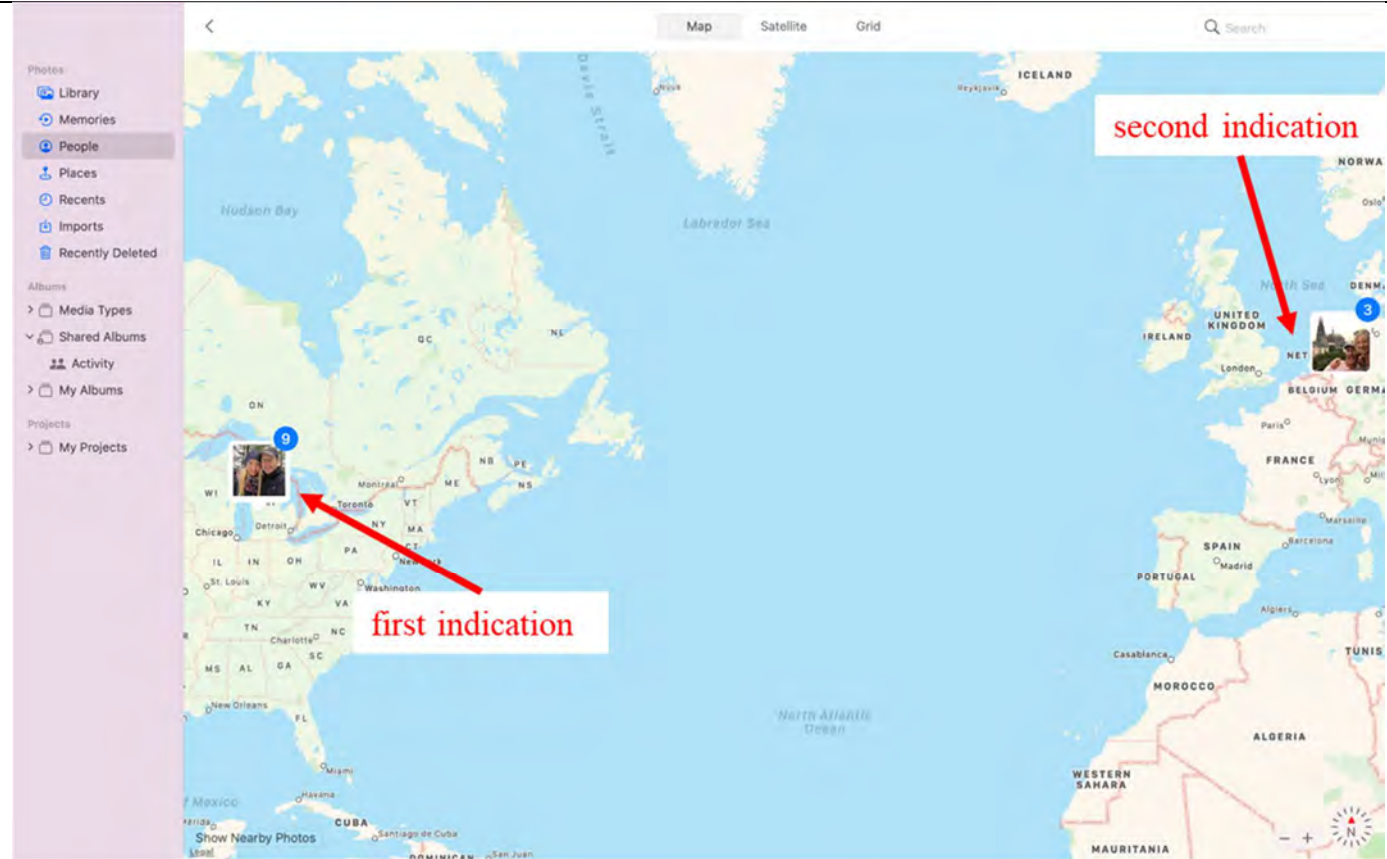
the interface, the first location view including:



**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.

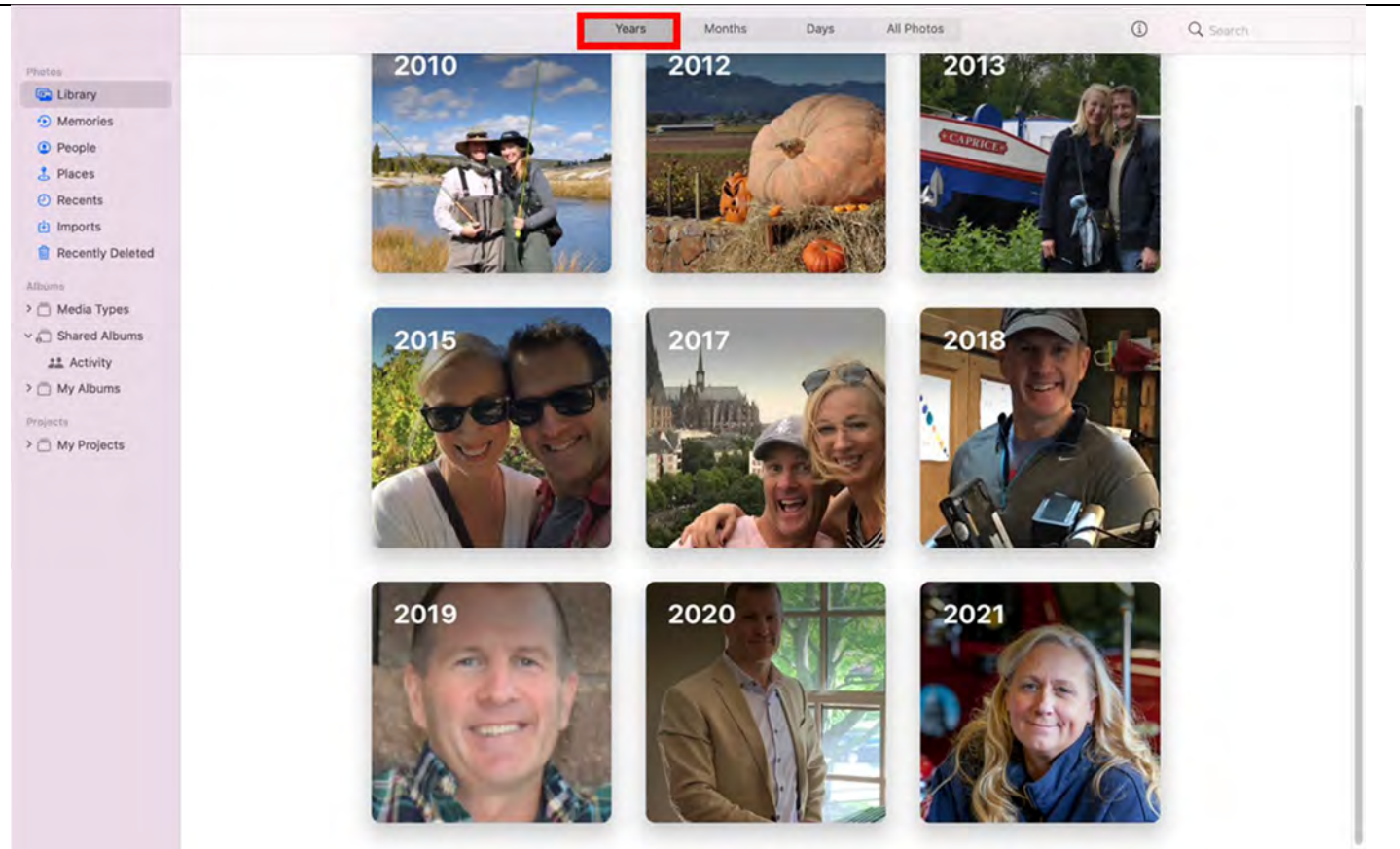
the interactive geographic map, and **31[c][iii]** a second indication positioned at a second location on the interactive geographic map;



**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.

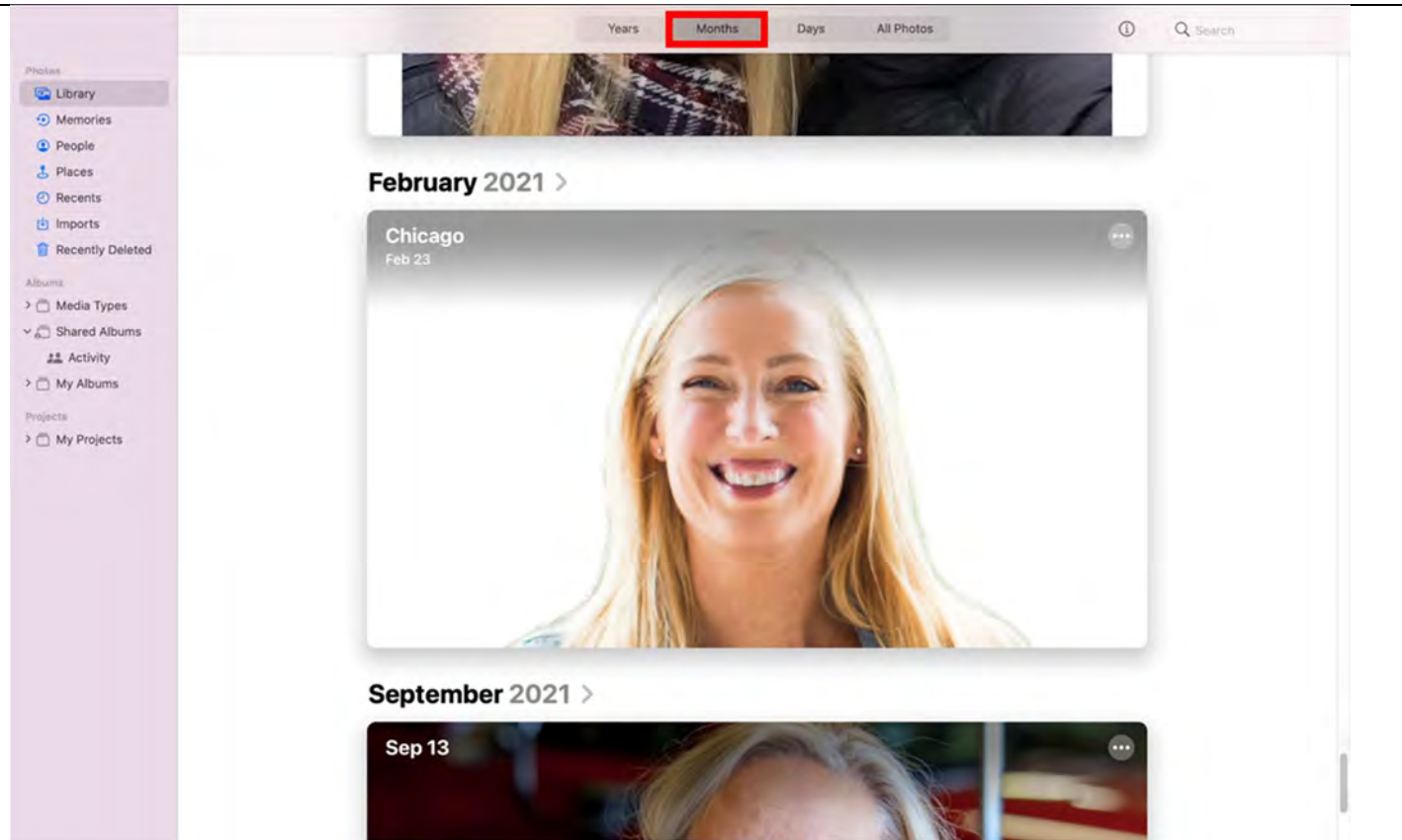
displayed on the interface;



**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



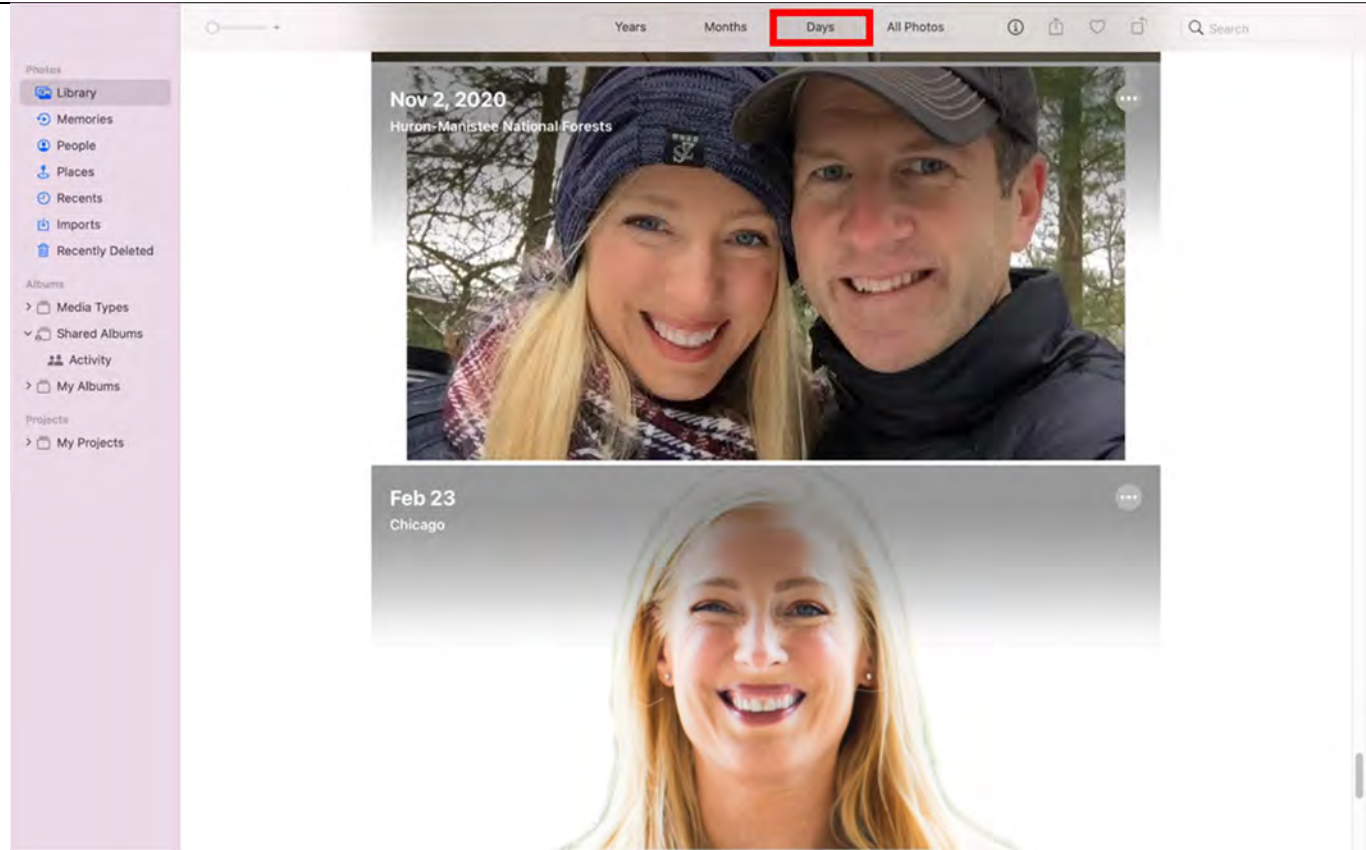
**31[f]** responsive to receiving a day input, grouping the plurality of digital files based on day and causing at least one of the plurality of digital files to be

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.



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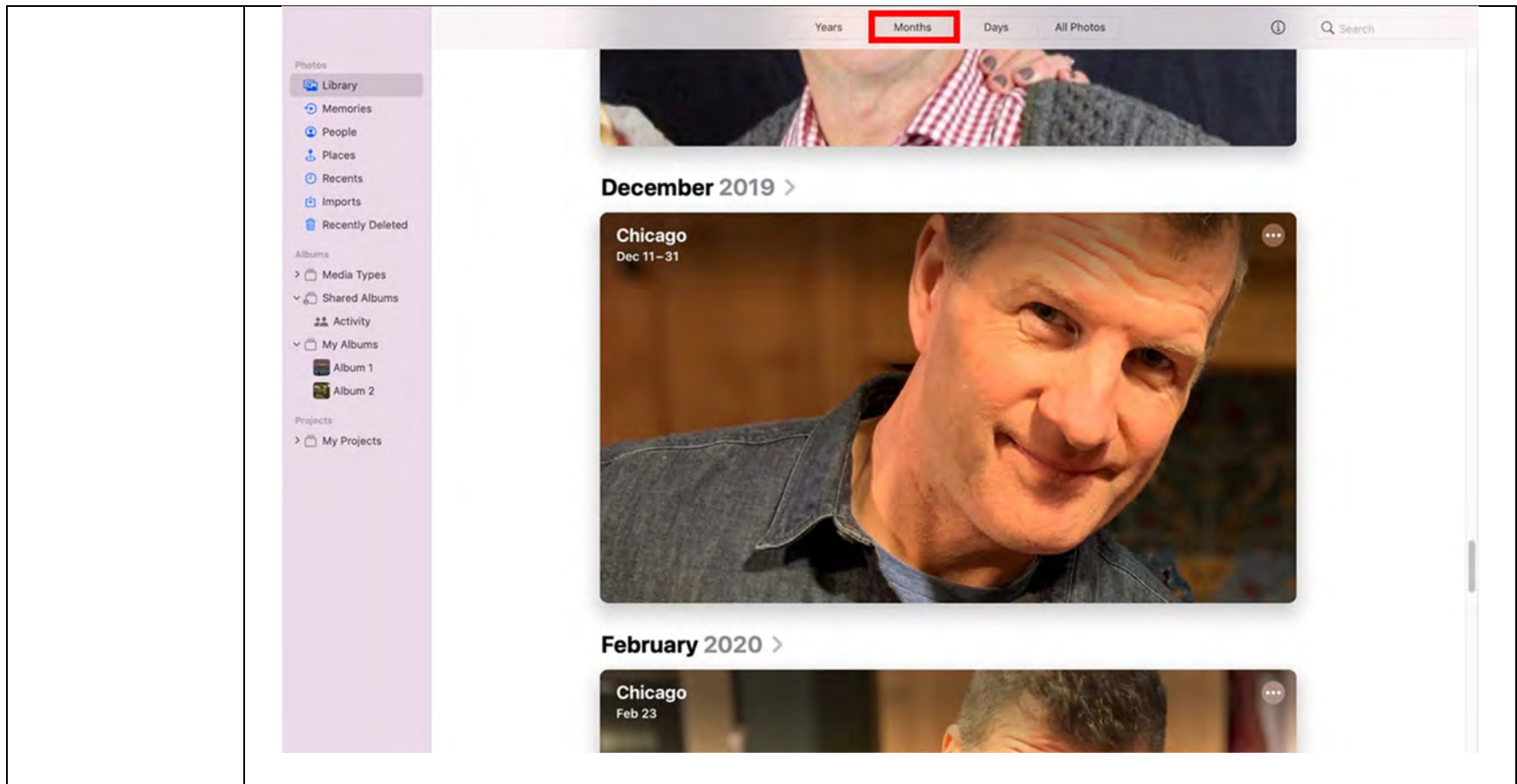
displayed on the interface.



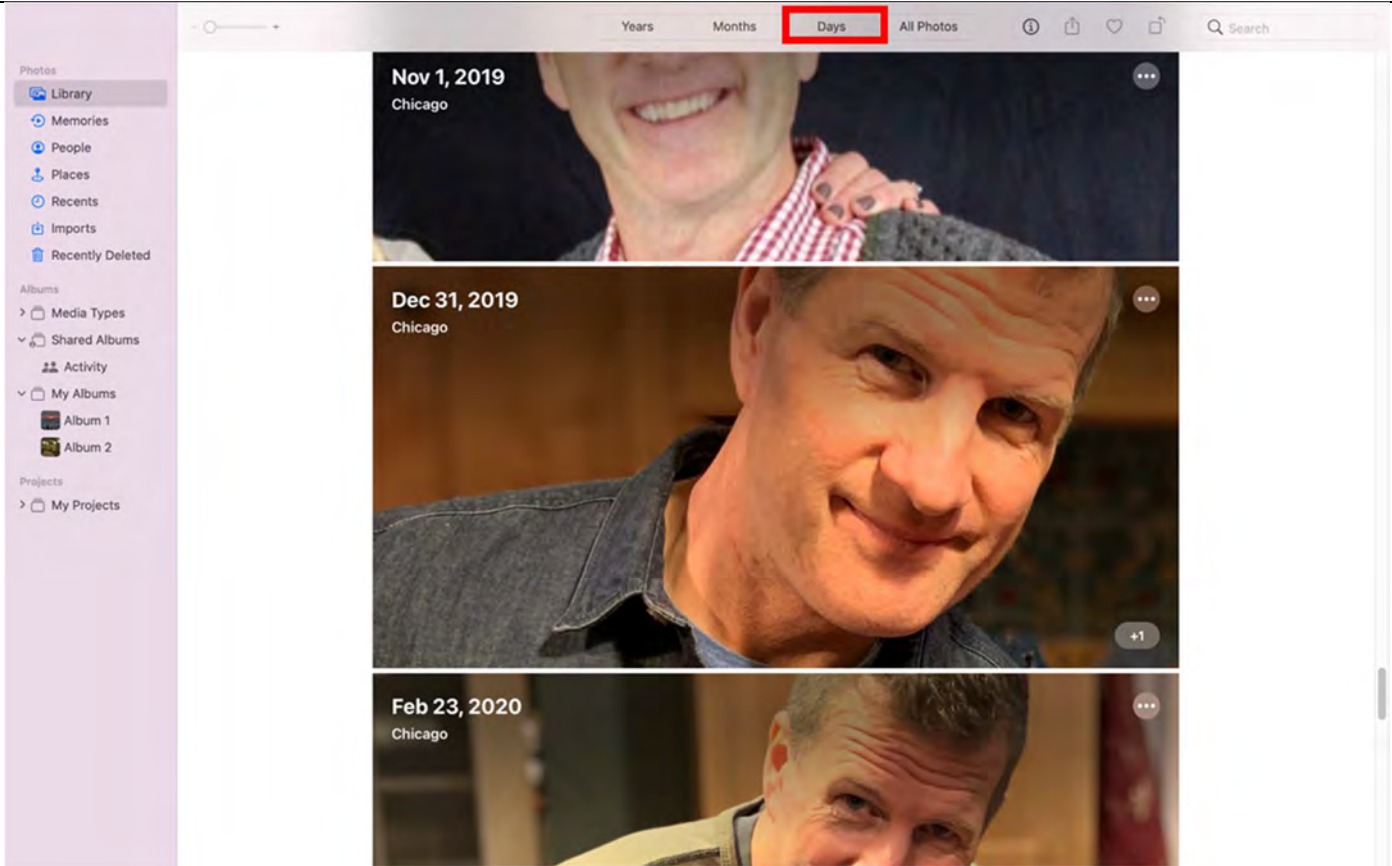
**32.** The method of claim 31, wherein the first digital file is included in the plurality of digital files.

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.

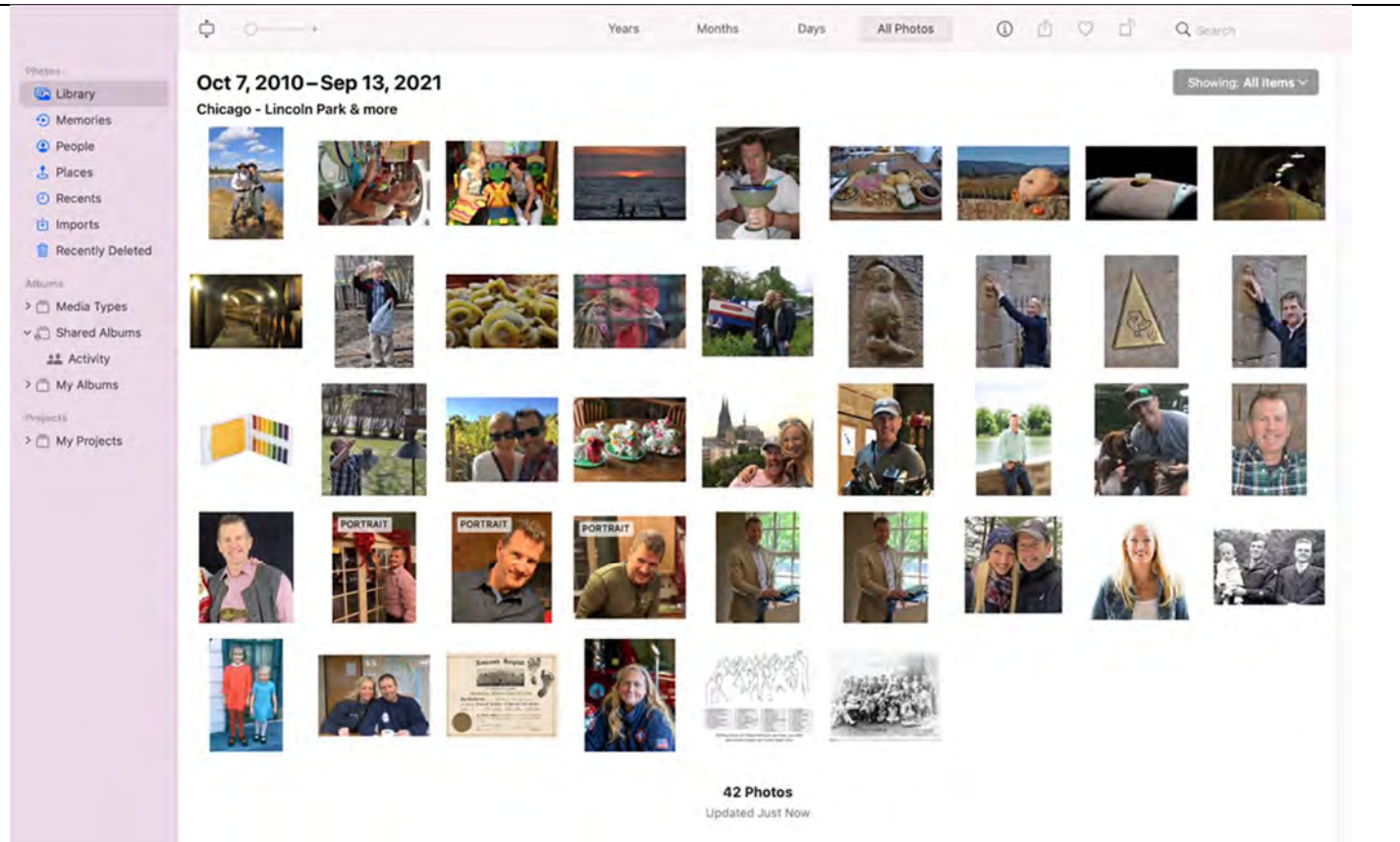
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<p><b>33.</b> The method of claim 31, further comprising causing the interface to display an interactive timeline view prior to receiving the</p>	<p>macOS causes the interface to display an interactive timeline view prior to receiving the year input, 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>

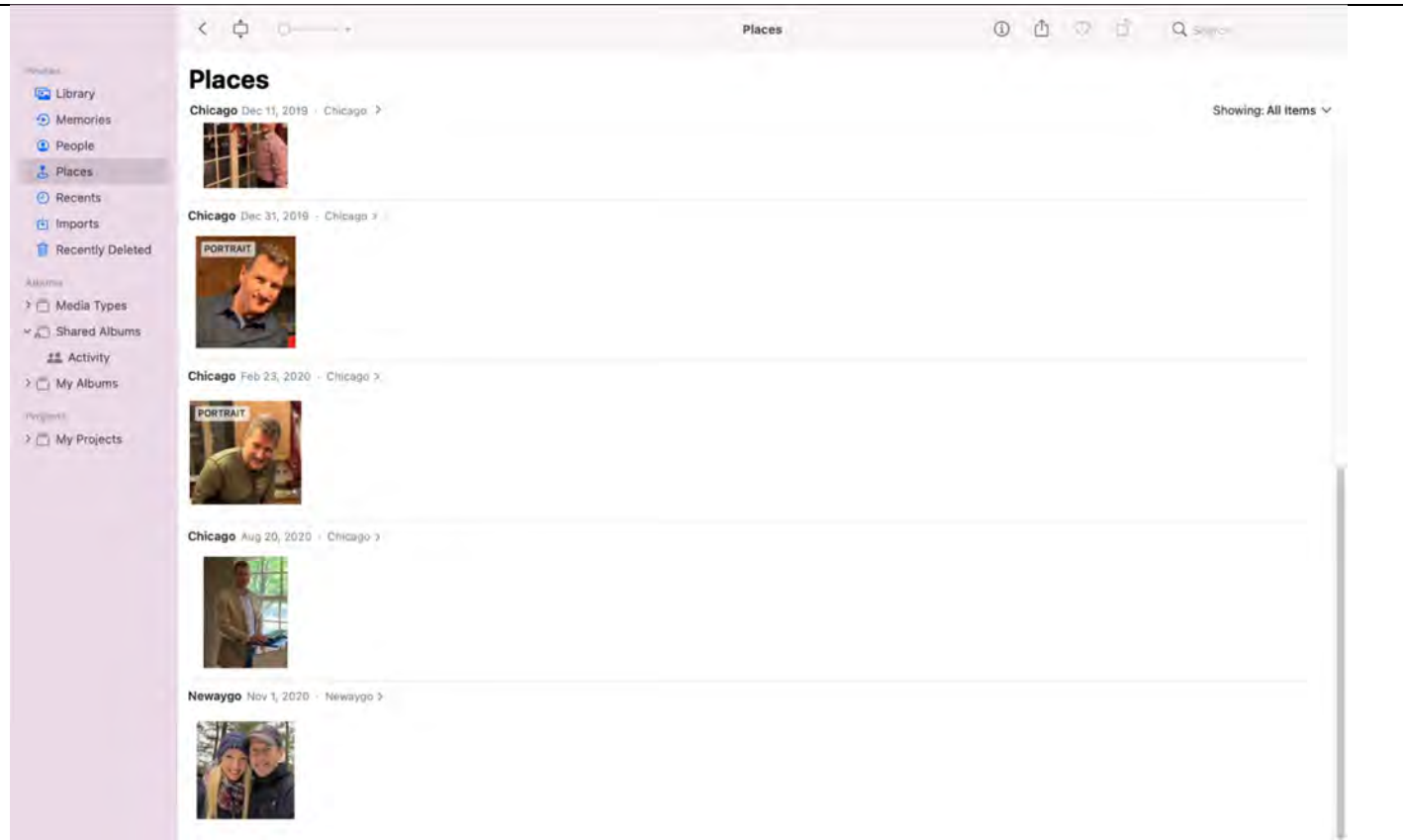
year input, prior to receiving the month input, and prior to receiving the day input, the interactive timeline view permitting a user to provide the year input, the month input, the day input, or any combination thereof to group the plurality of digital files.



**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

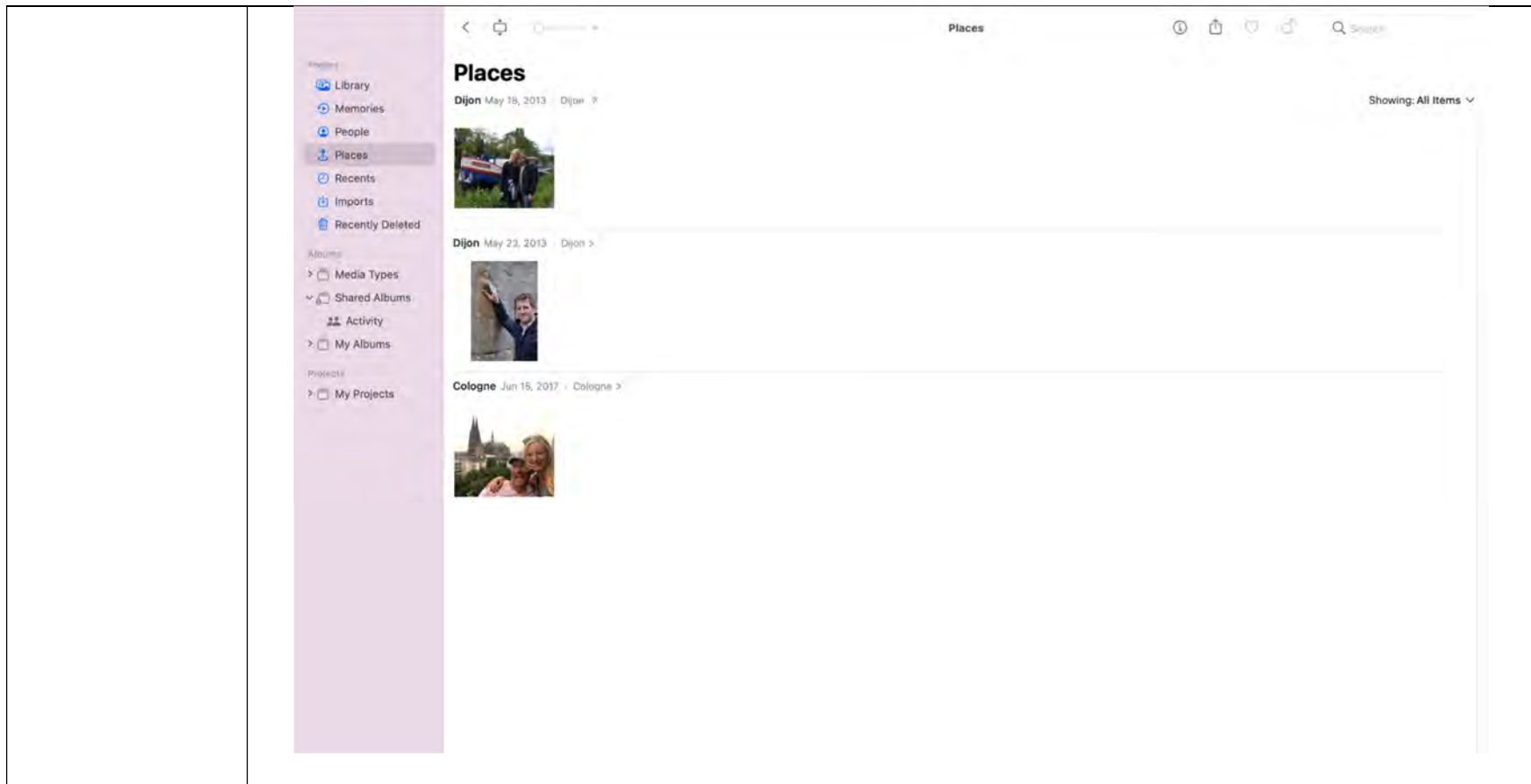
The first indication is associated with a first set of digital files and the first location. For example, macOS causes the view below to be displayed responsive to a touch/tap of the first indication.

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.

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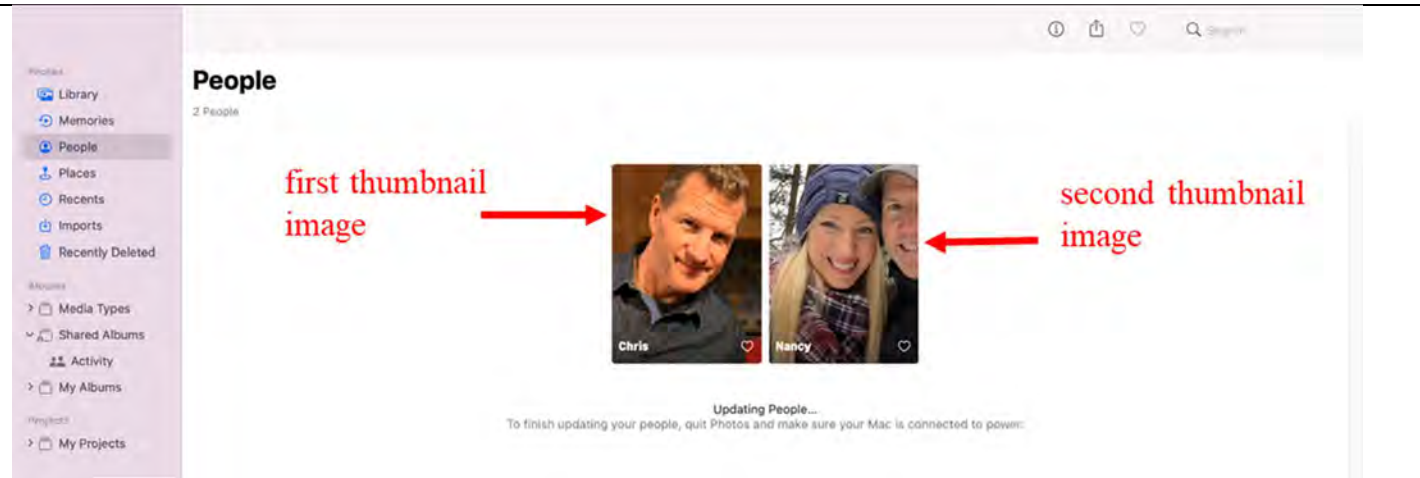


**35.** The method of claim 34, wherein the first set of digital files and the second set of digital files are associated with the first person.

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.

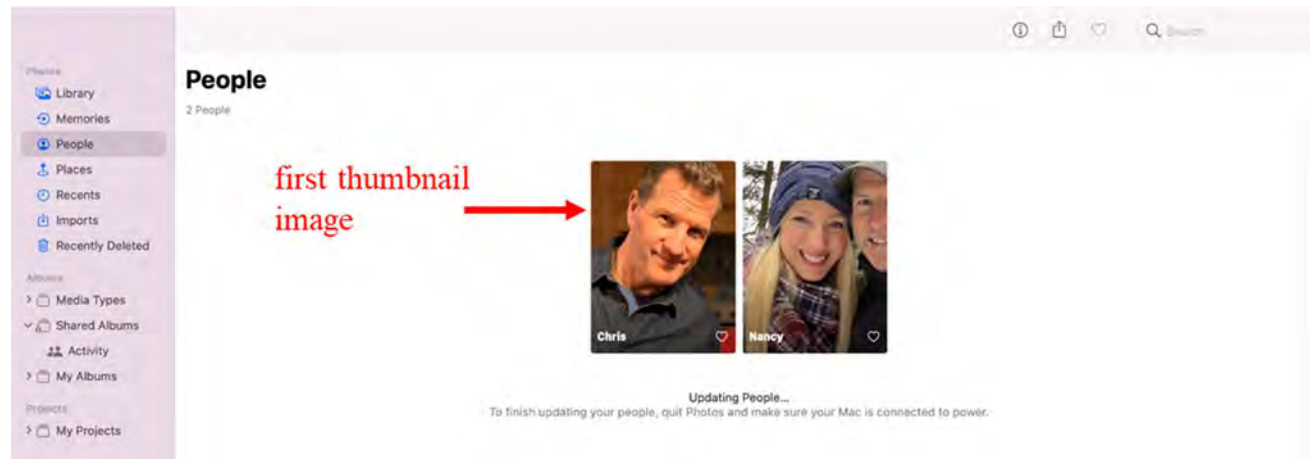
<p><b>36.</b> The method of claim 35, wherein the first thumbnail image includes at least a portion of a face of the first person and the</p>	<p>The first thumbnail image includes at least a portion of a face of the first person and the second thumbnail images includes at least a portion of a face of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

second thumbnail images includes at least a portion of a face of the second person.

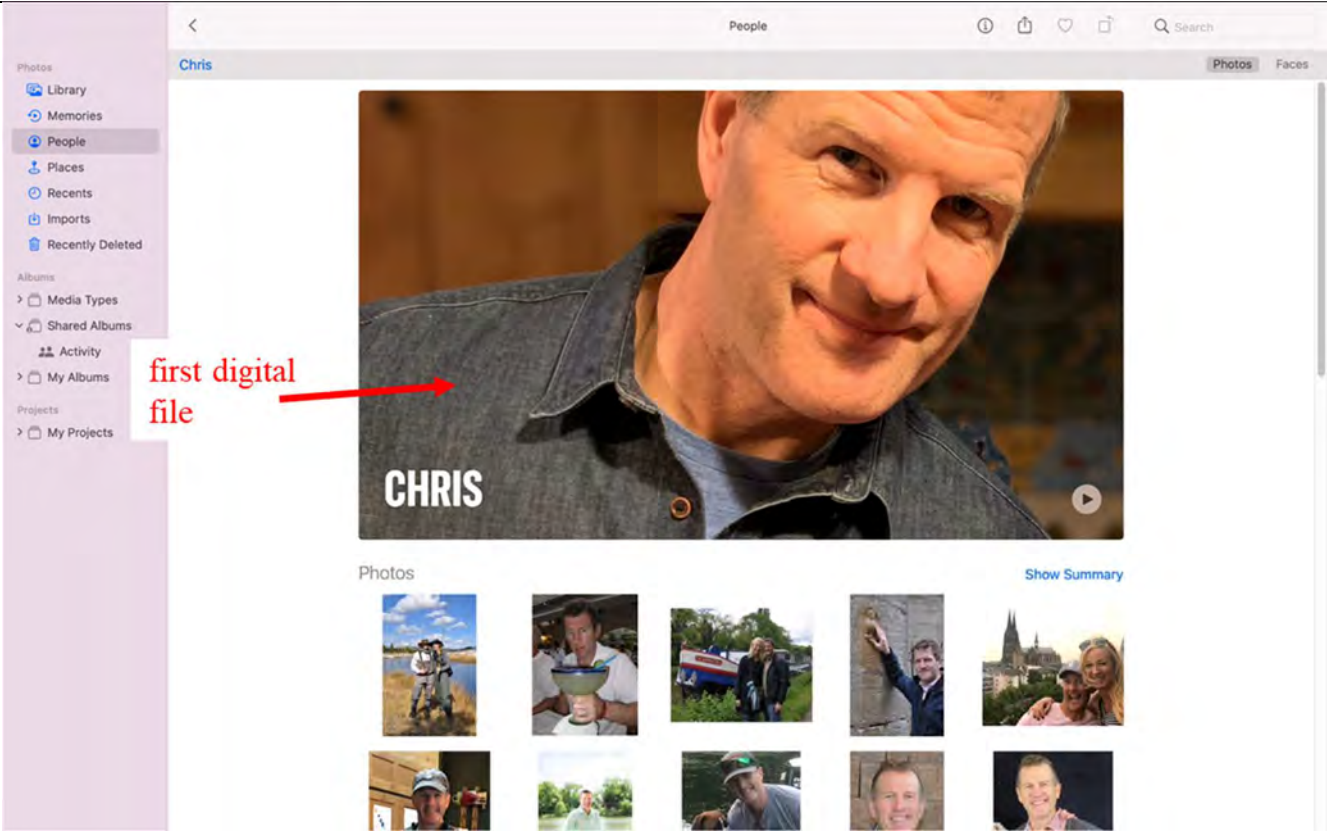


37. The method of claim 36, wherein the first thumbnail image includes at least a portion of the first digital file.

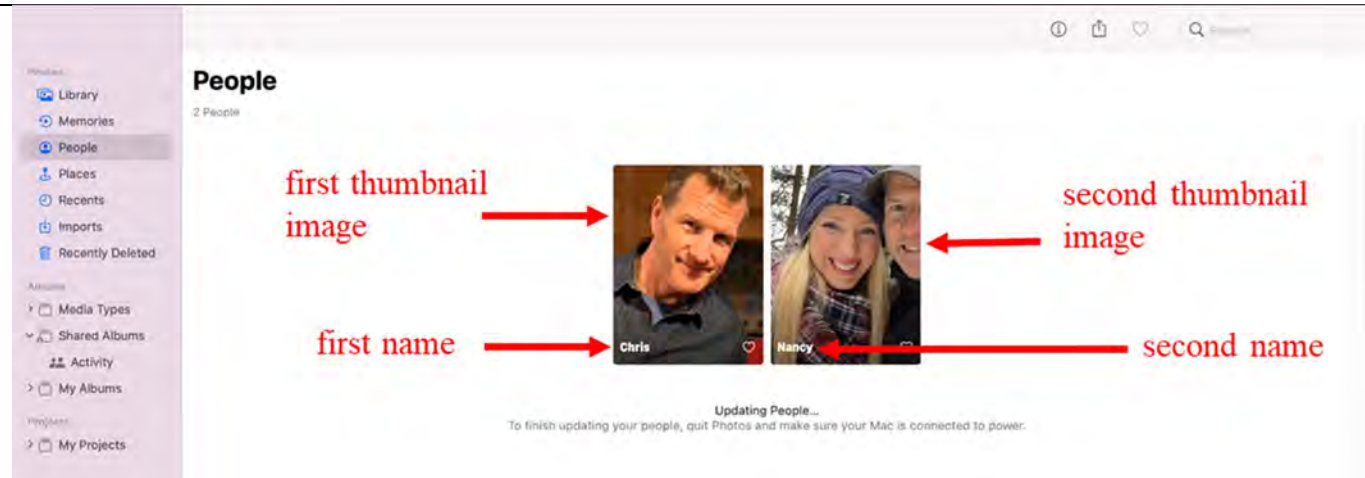
The first thumbnail image in the people view includes at least a portion of the first digital file in the first person view.





	 <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' written in red next to it. Below the main image is a grid of smaller photo thumbnails, with the first one being a landscape scene.</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.

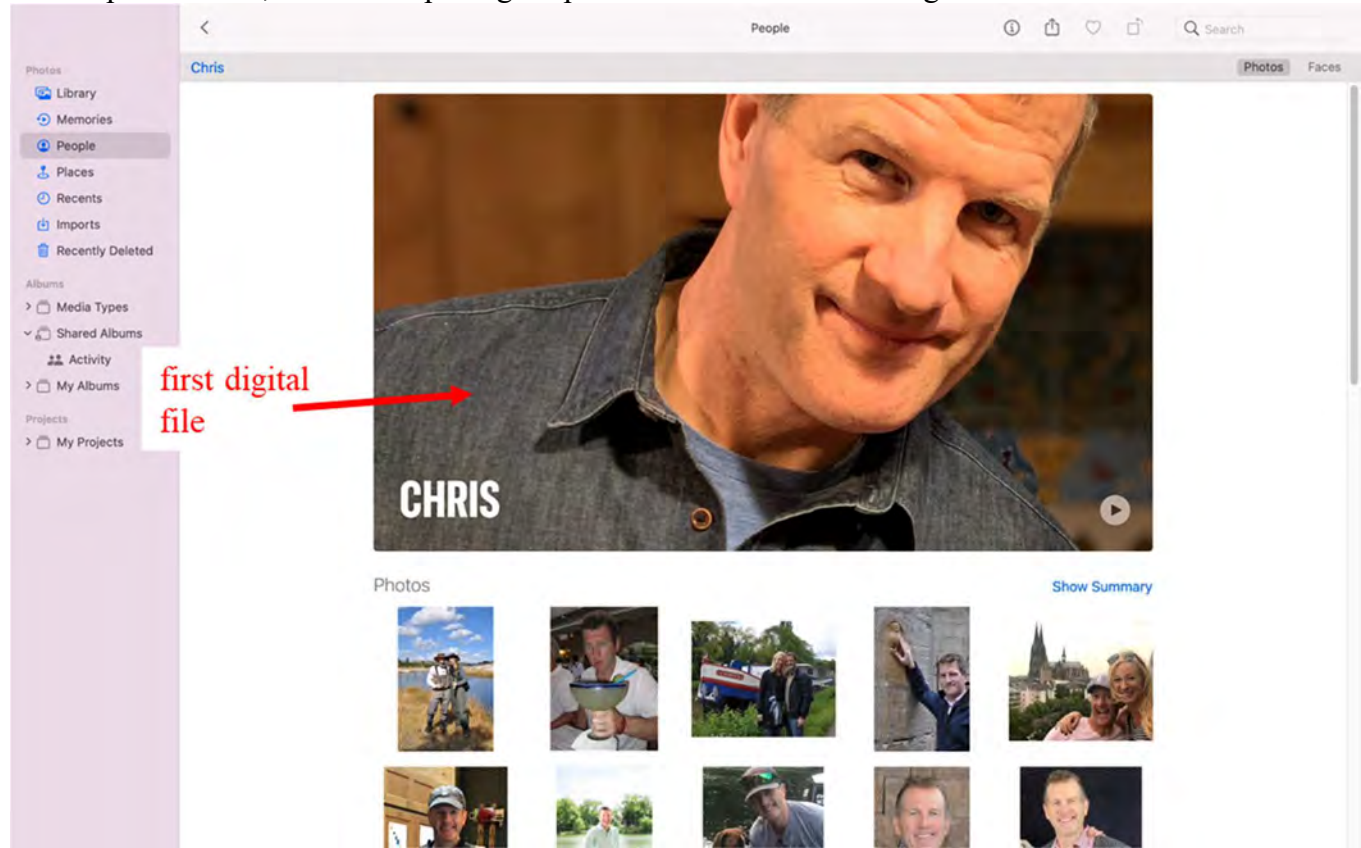


To the extent it is found that the first name is not literally displayed adjacent to the first thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the first name is to communicate 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.

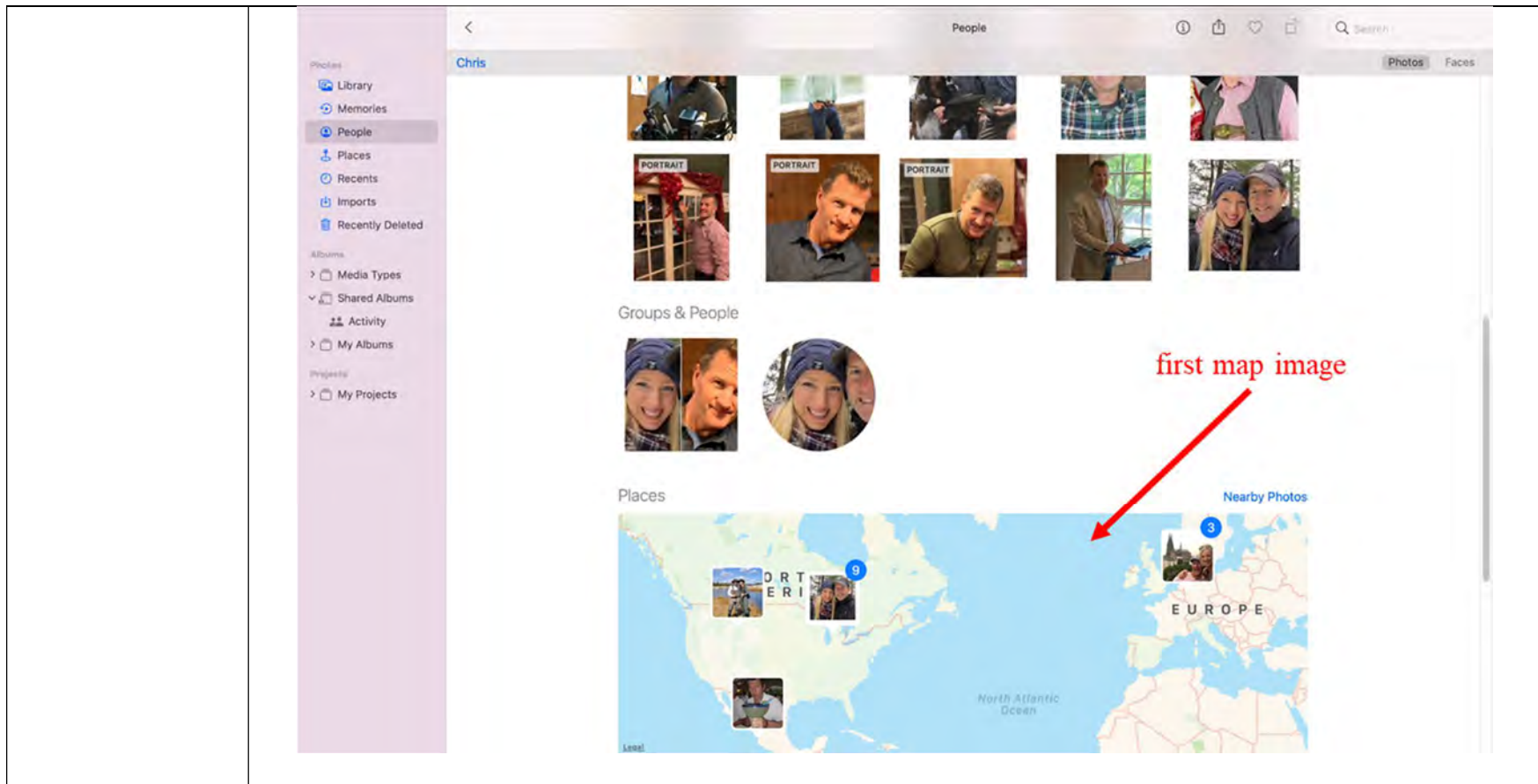
Similarly, to the extent it is found that the second name is not literally displayed adjacent to the second thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed displaying the second name 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.



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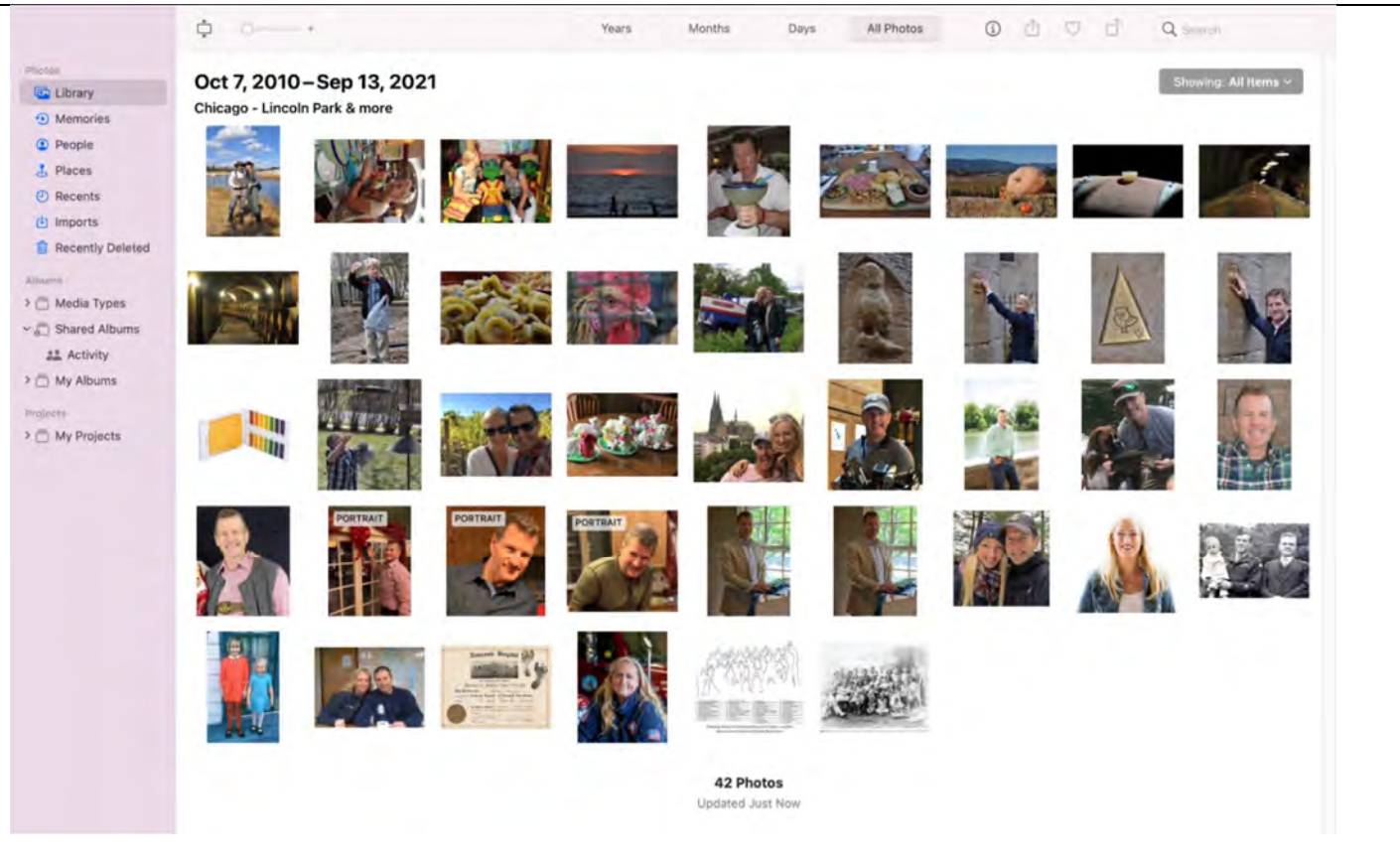
**40[pre]** The method of claim 31, further comprising,

*See information for claim 31.*

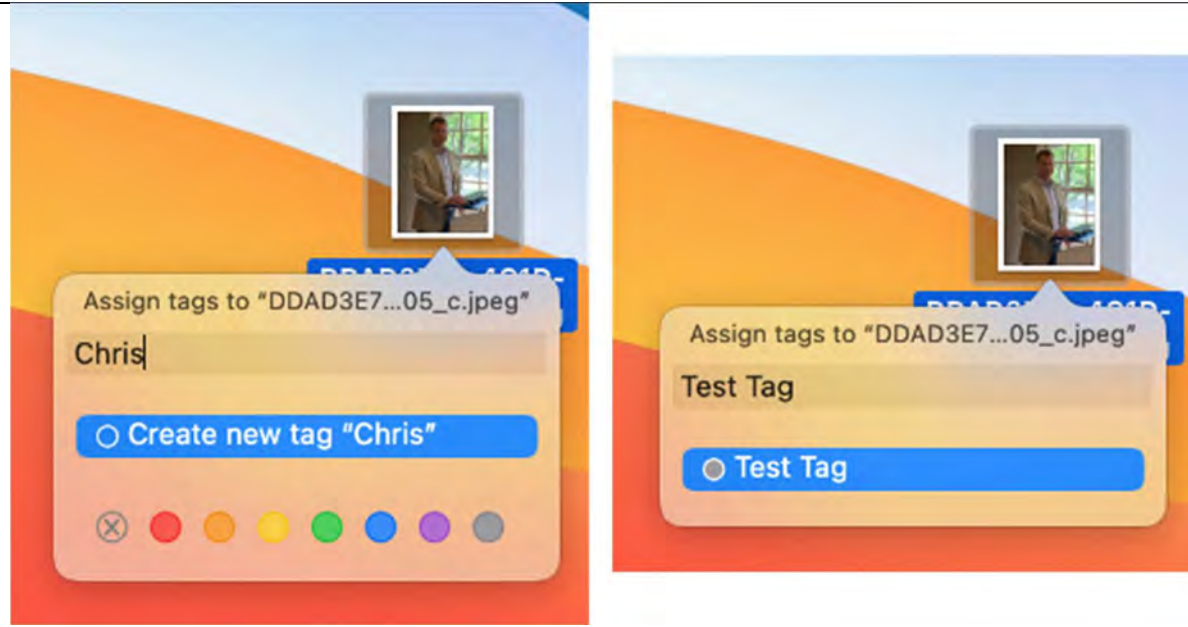
**40[a]** prior to the causing the interface to display the people view:

Prior to the causing the interface to display the people view, macOS causes the first digital file to be displayed on the interface.

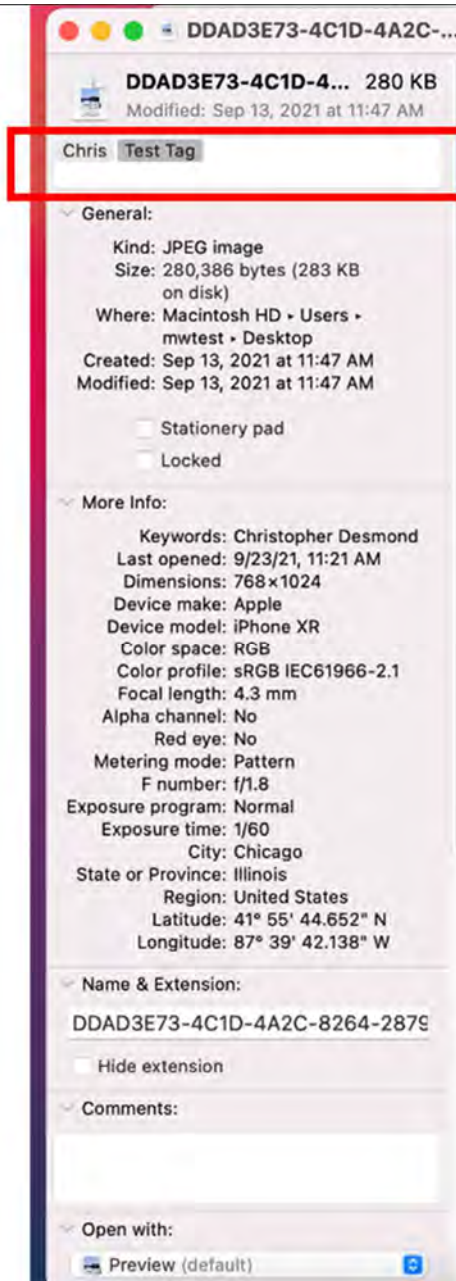
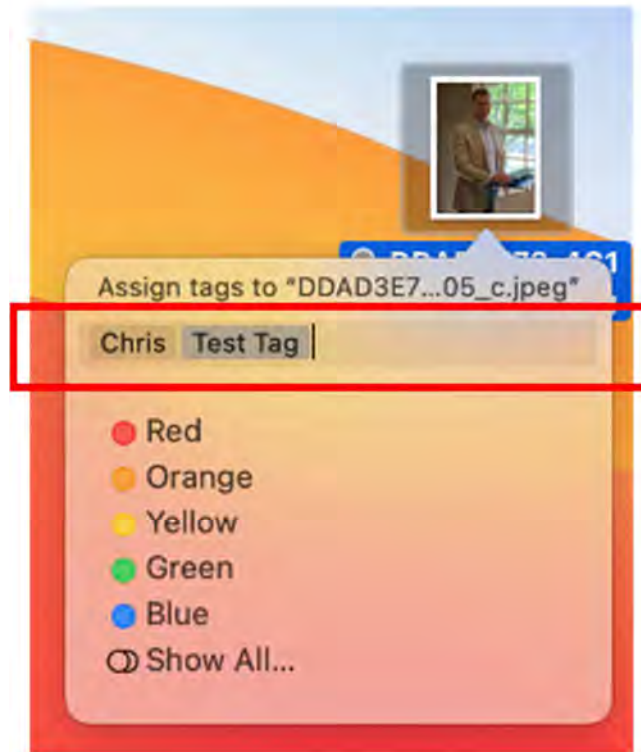
causing the first digital file to be displayed on the interface;

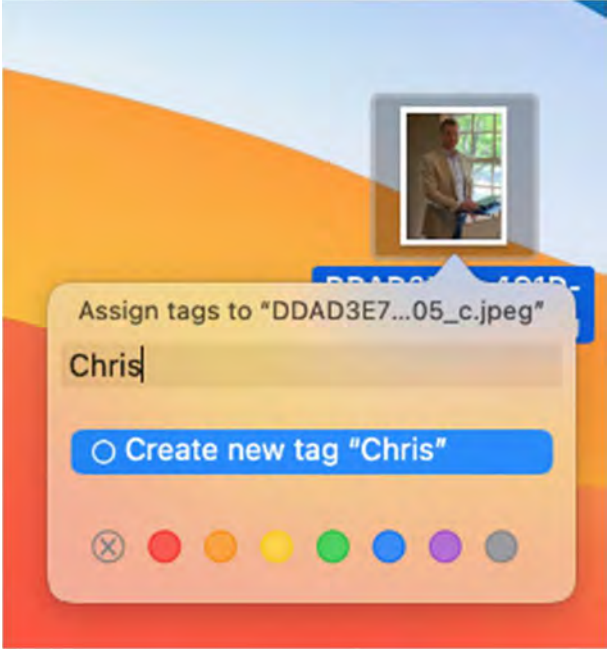


40[b] receiving alphanumeric text as a first user-generated tag; and




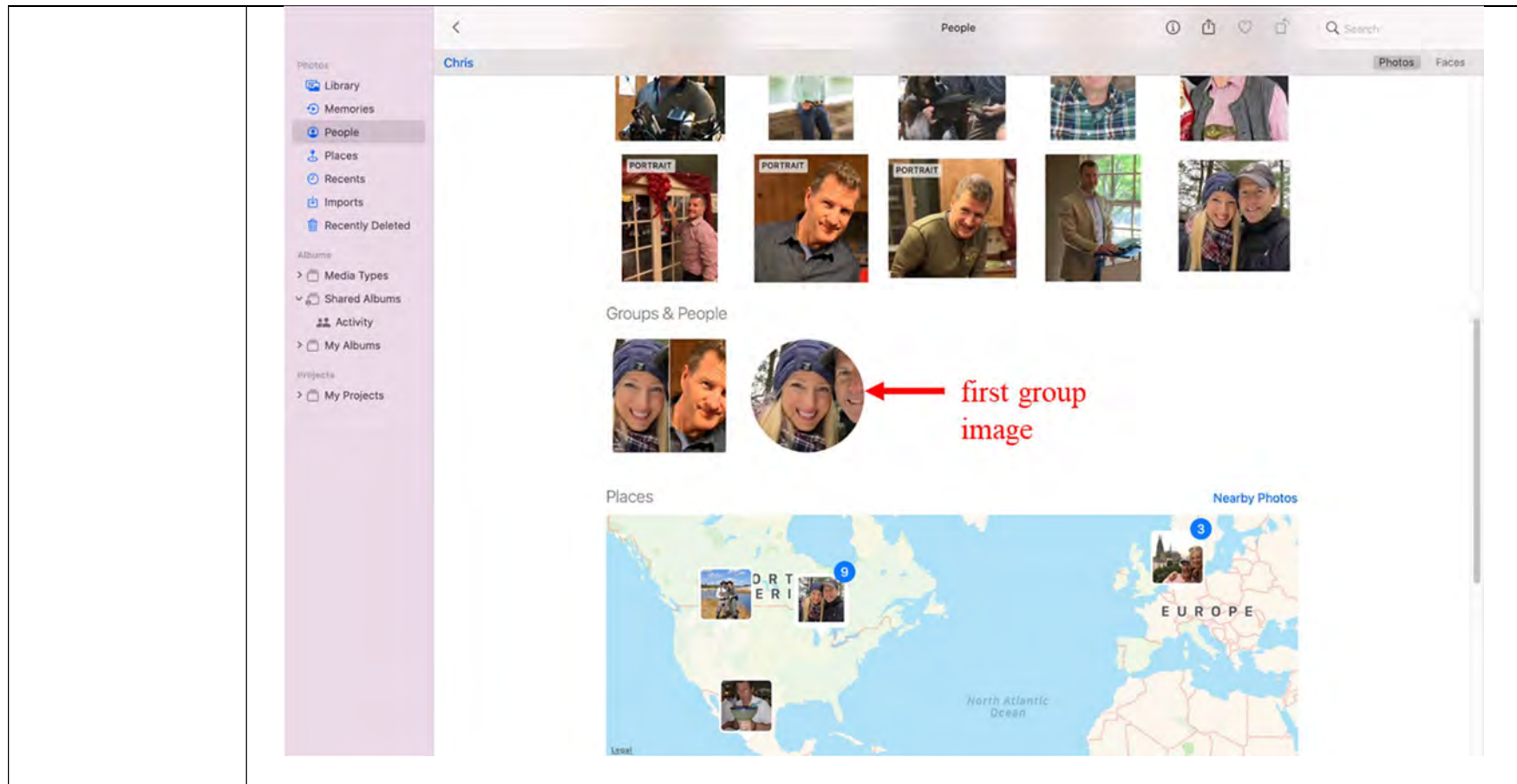
40[c] associating the first digital file with the first user-generated tag.



<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 screenshot 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, there 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 a doorway.</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>



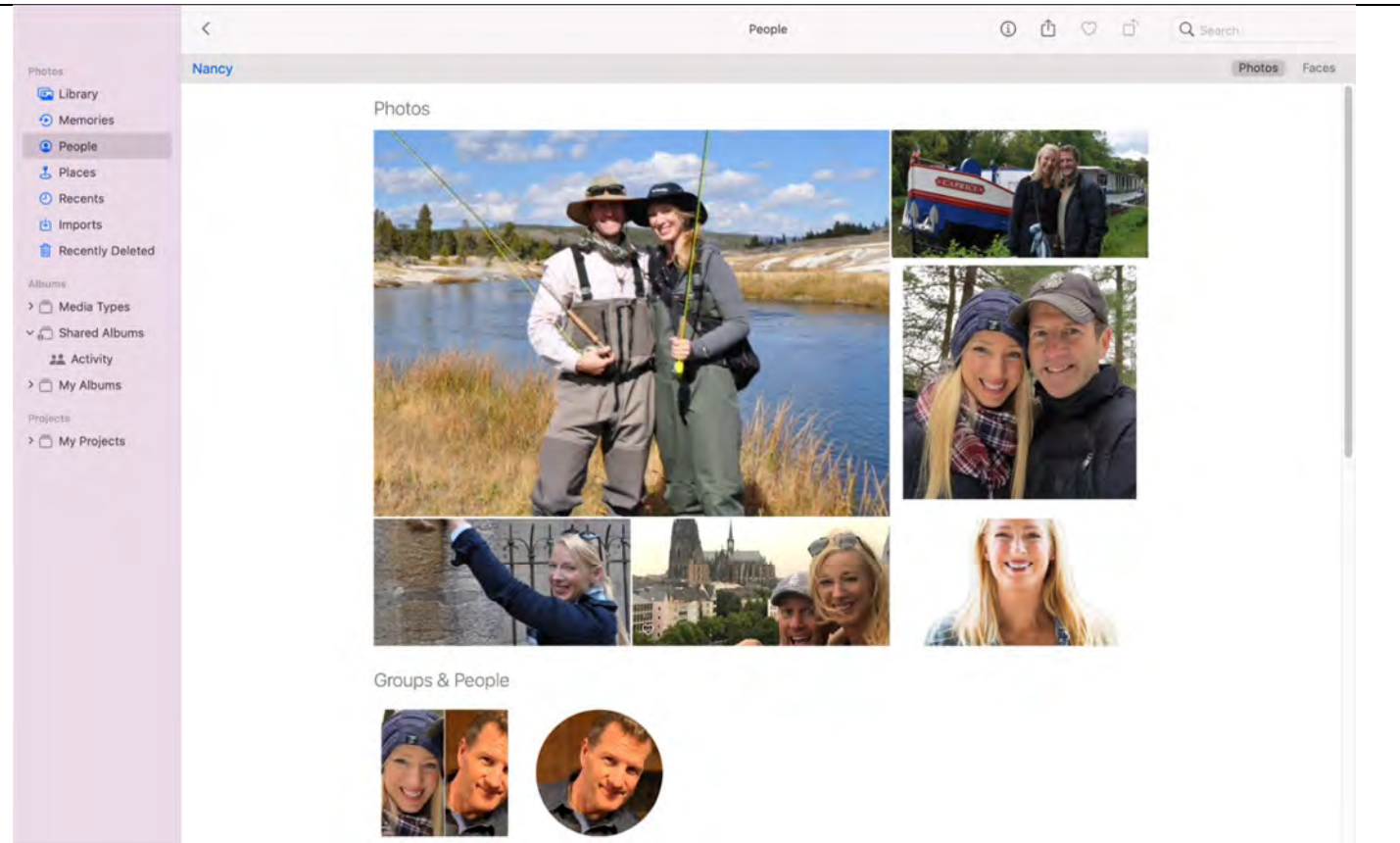
<p>first user-generated tag.</p>	 <p>The screenshot shows the 'Info' screen of an iPhone camera. At the top, it says 'Info' and 'Done'. Below are various camera settings: Lens (iPhone XR back camera 4.25mm f/1.8), Aperture value (1.696), Exposure time (1/60), Exposure program (Normal), Focal length (4.3 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.

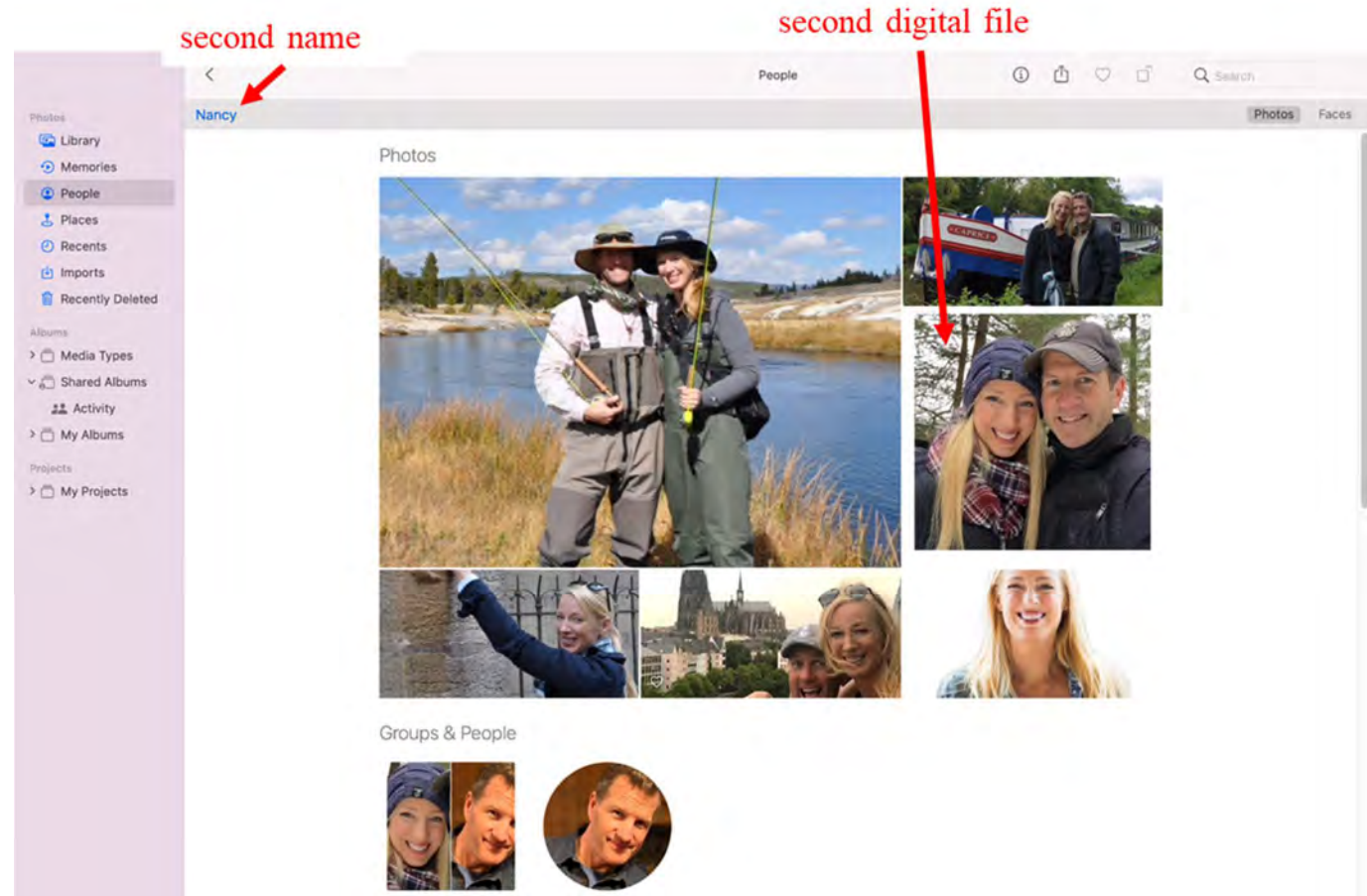
The another person is the second person. See information for limitations 31[a][iii]-[iv] and claim 43.

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

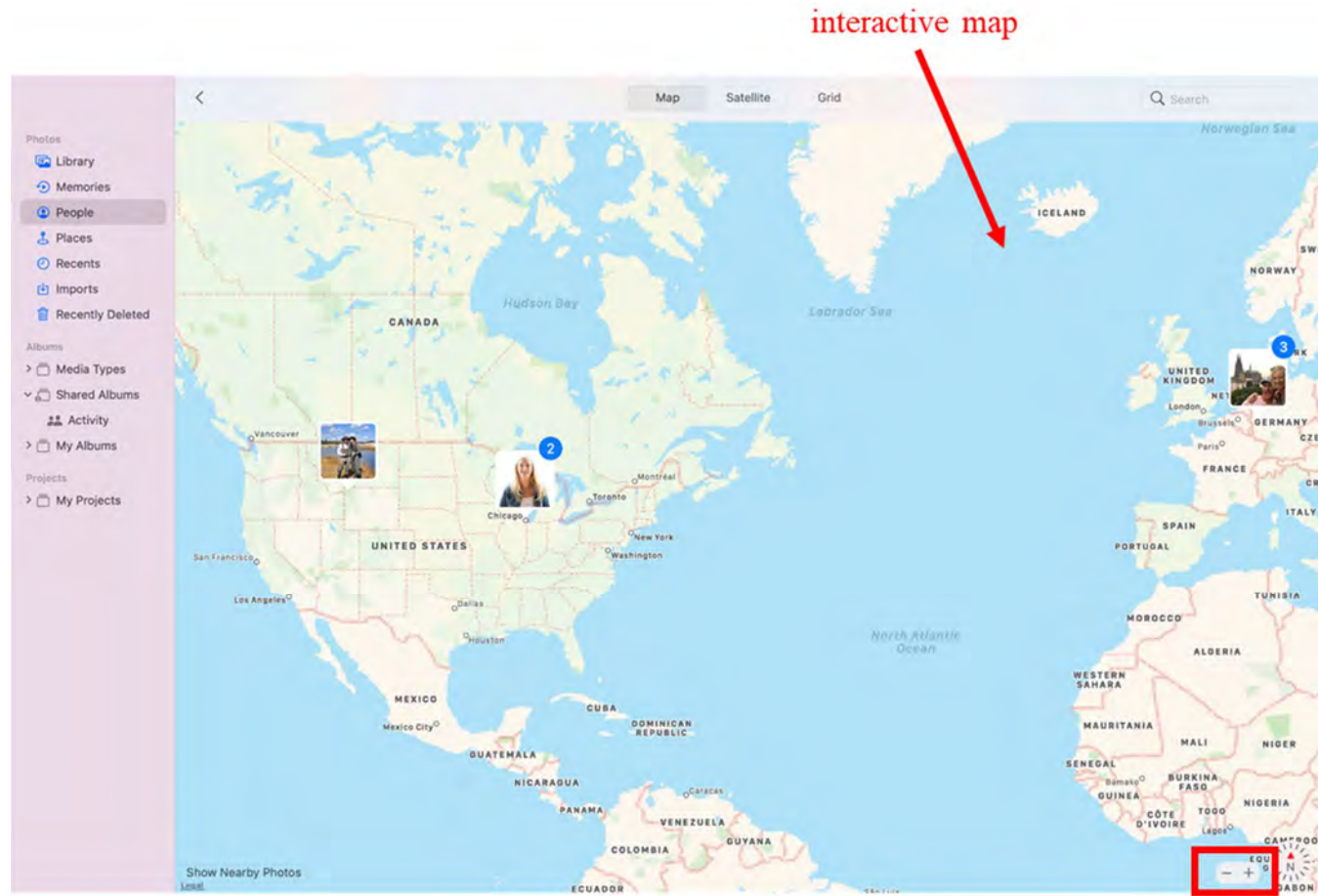
comprising responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including the second digital file associated with the second person, the second name associated with the second 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. 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. Further down is a 'Groups &amp; People' section with 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>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>

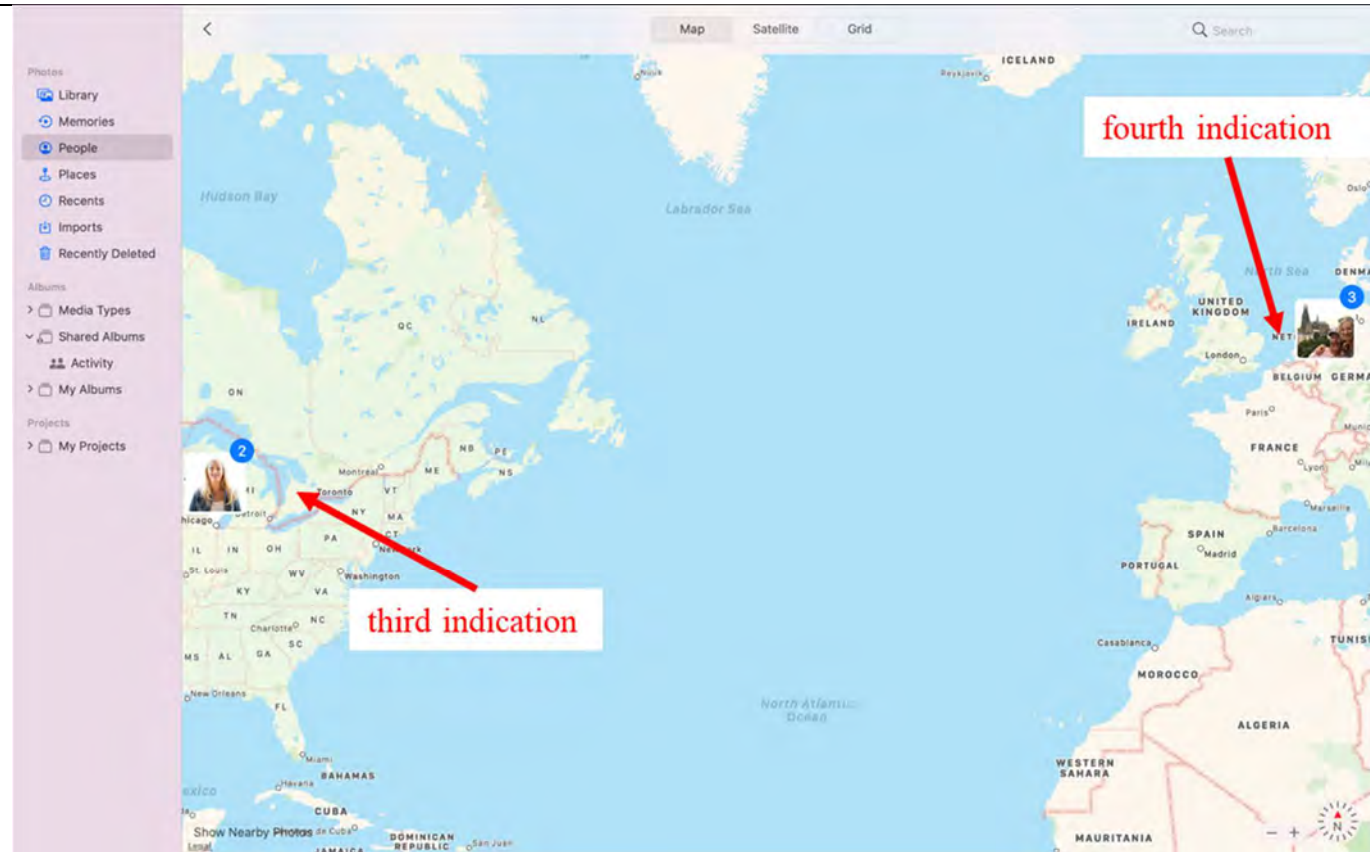
selection of the second map image, causing a second location view to be displayed on the interface, 46[b] the second location view including: the interactive geographic map,



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.

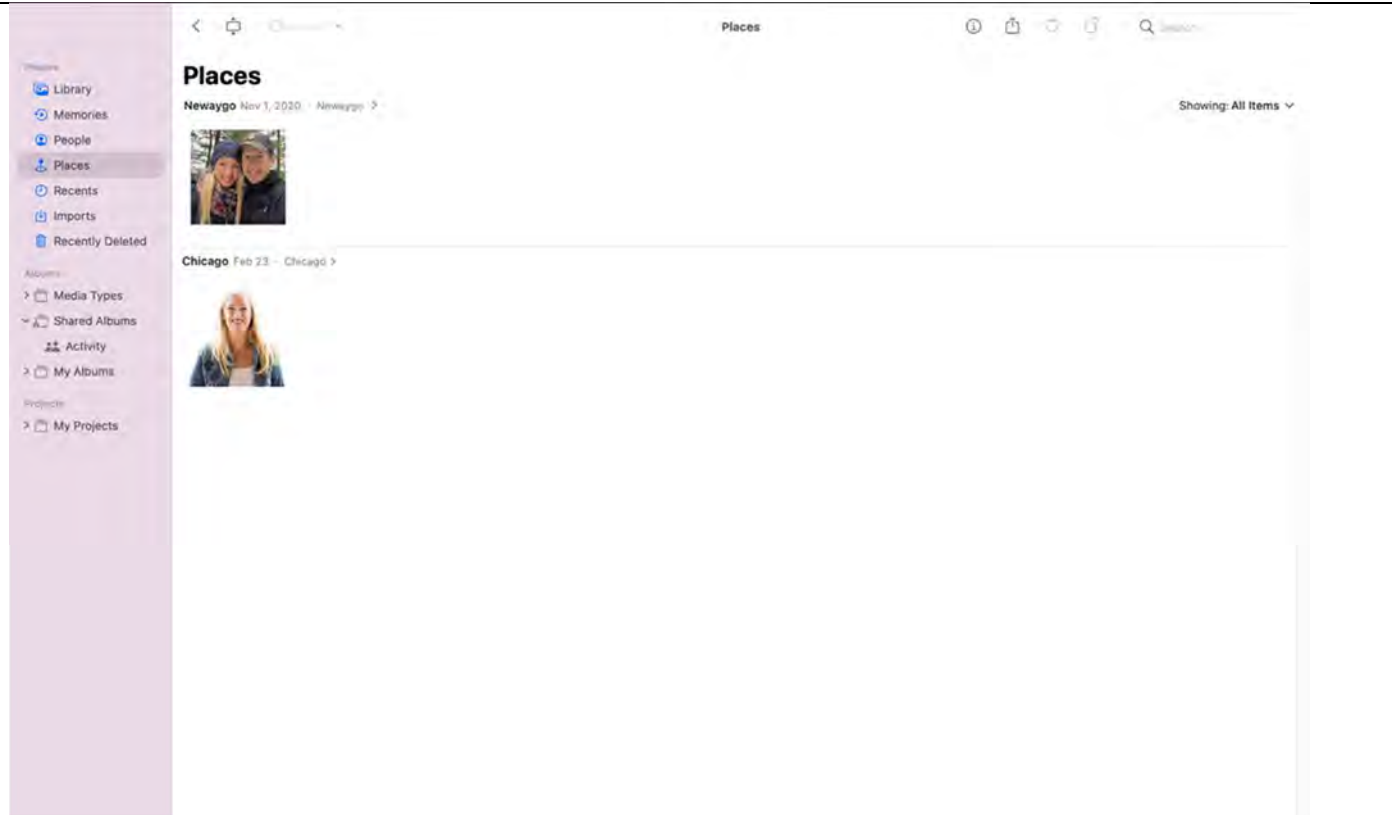
46[d] a fourth indication positioned at a fourth location on the interactive geographic map.



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.

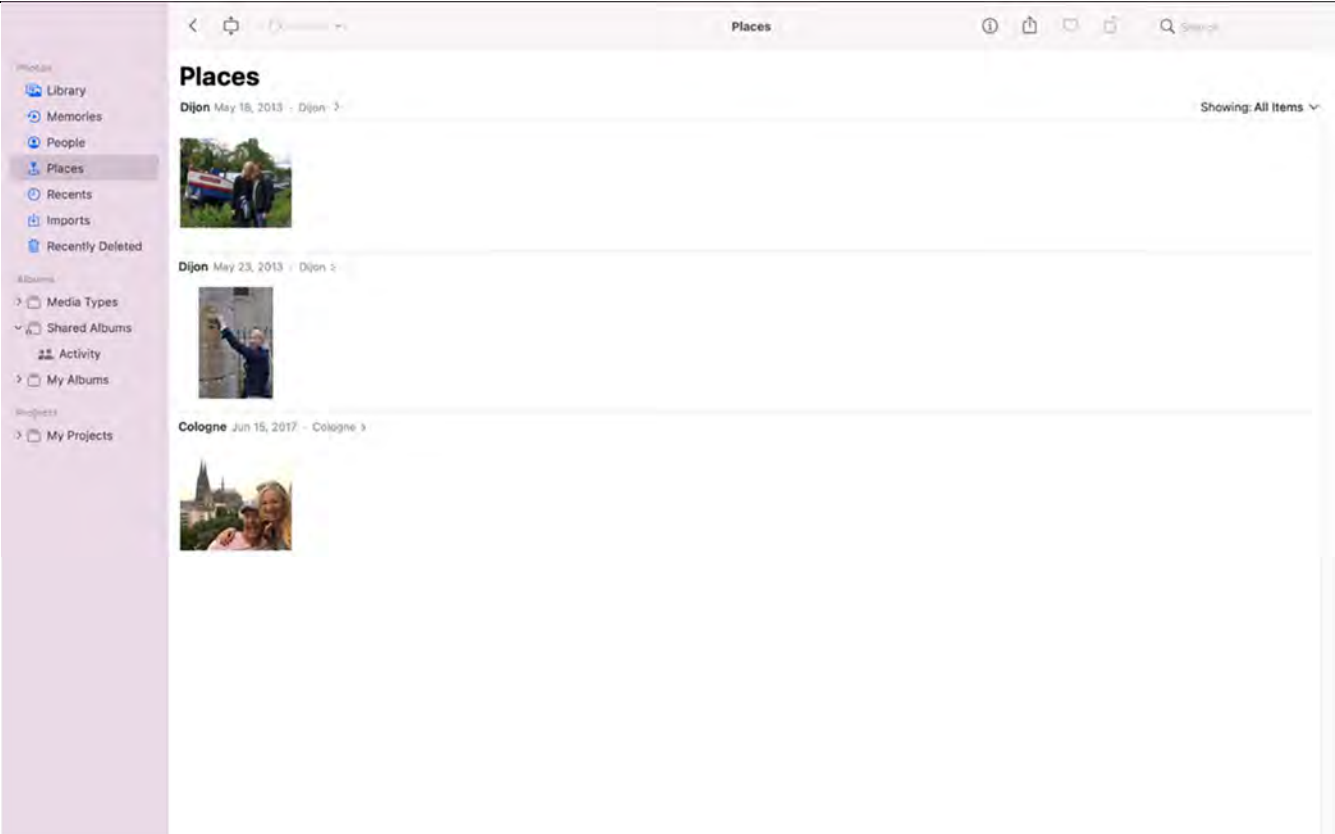
indication is associated with a fourth set of digital files and the fourth location.

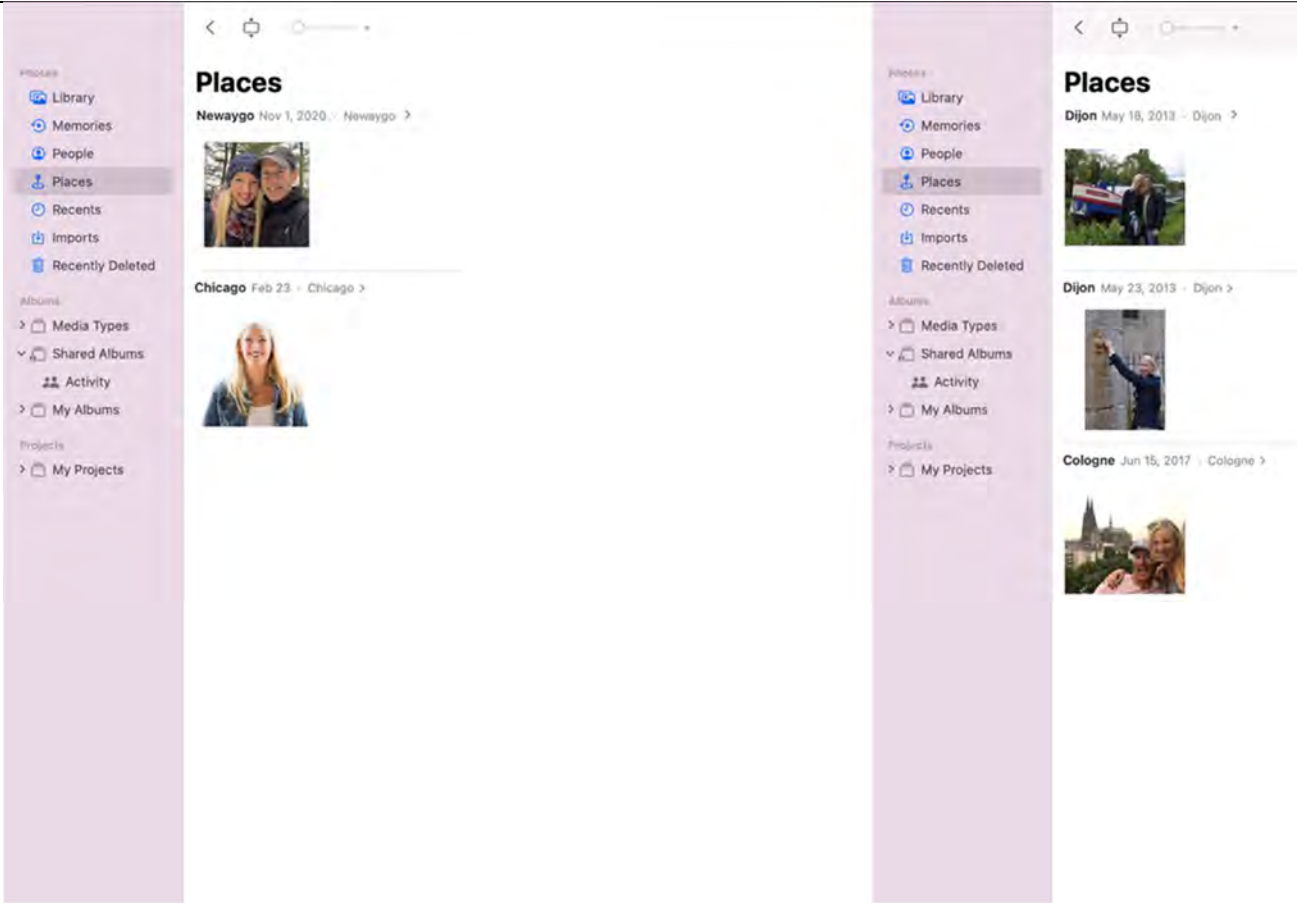


The fourth indication is associated with a fourth set of digital files and the fourth location.

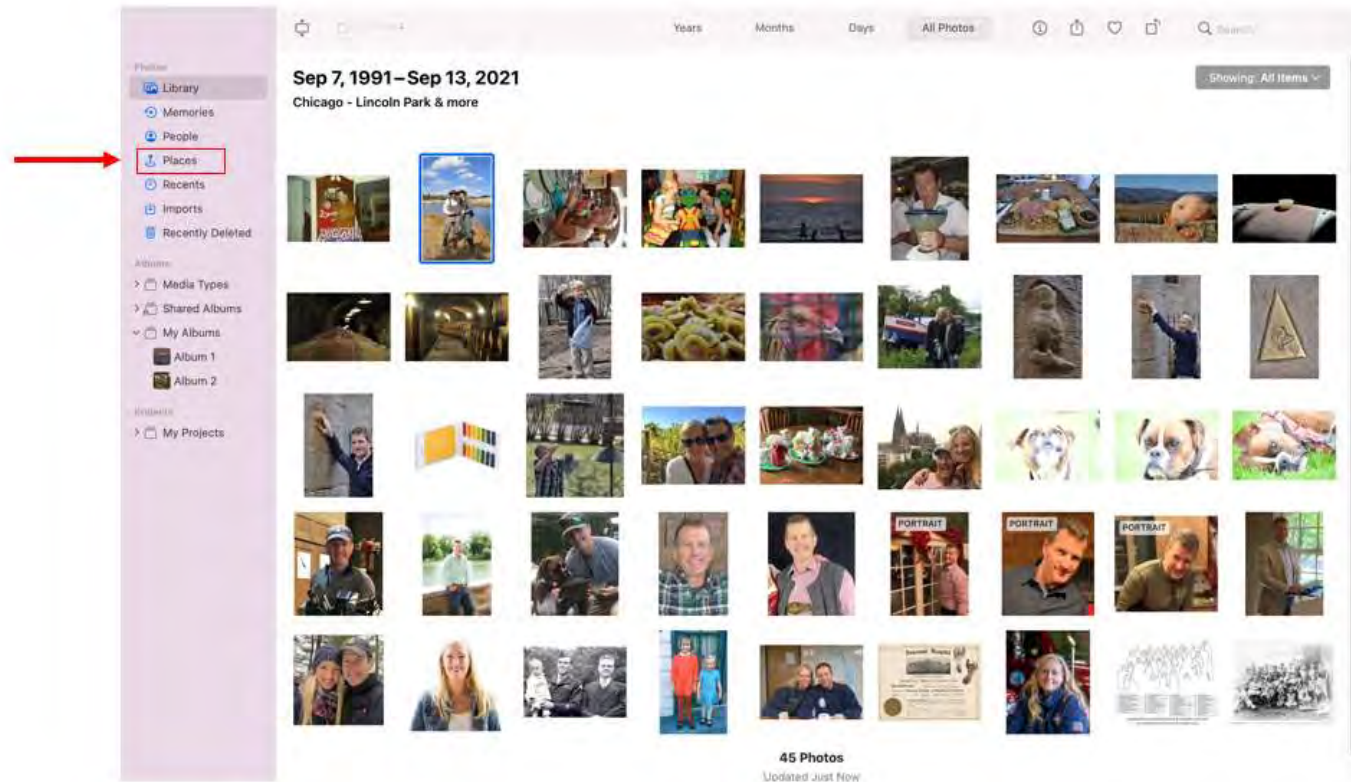


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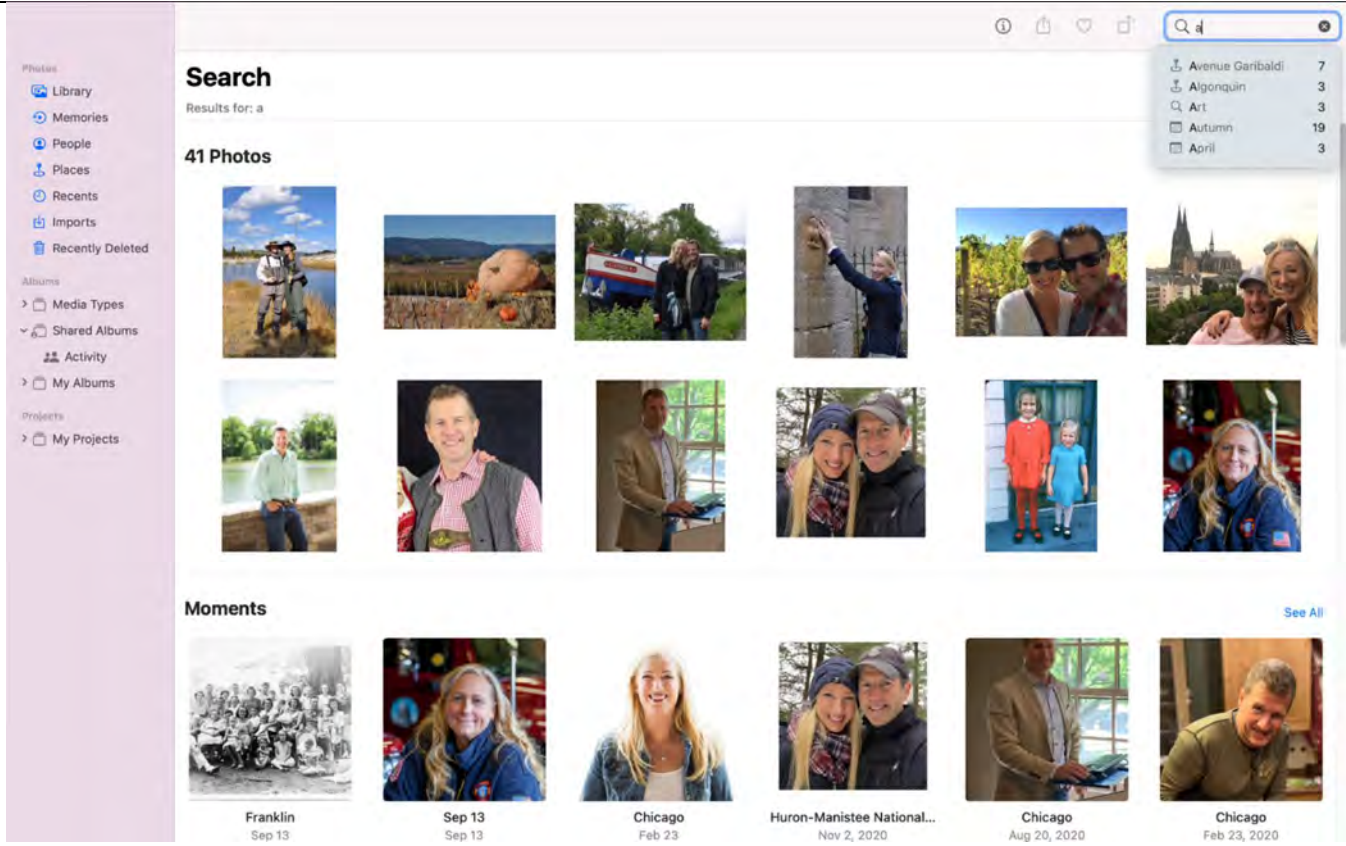
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with navigation options: Library, Memories, People, Places (selected), Recents, Imports, Recently Deleted, Media Types, Shared Albums, Activity, My Albums, and My Projects. The main area is titled 'Places' and displays a list of location-based photo albums. The first album is 'Dijon' from May 18, 2013, featuring a photo of a person in a red and white striped shirt. The second album is 'Dijon' from May 23, 2013, featuring a photo of a person in a blue jacket. The third album is 'Cologne' from Jun 15, 2017, featuring a photo of a person with a dog in front of a church. The interface includes a search bar at the top right and a 'Showing: All Items' dropdown menu.</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.

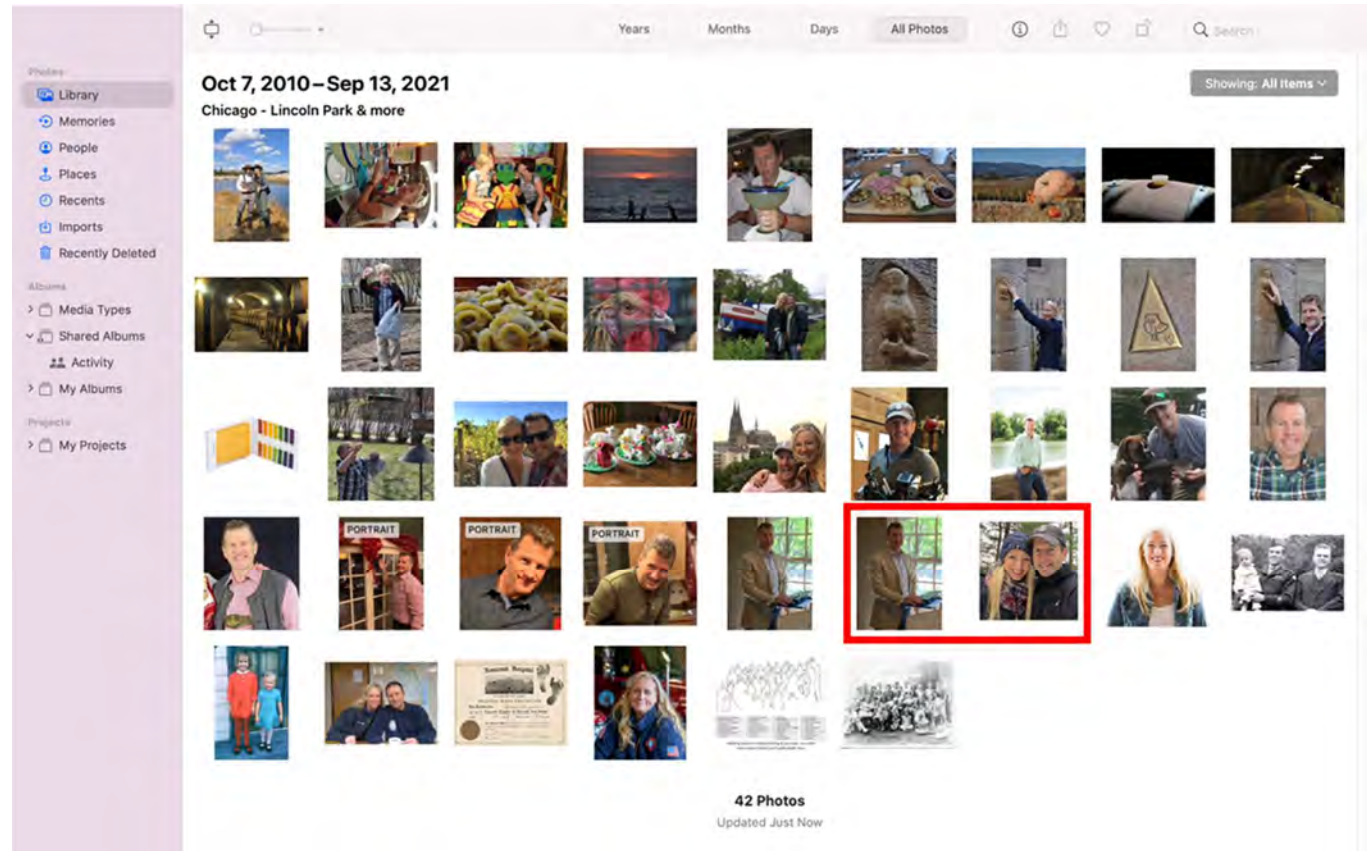


Further, macOS receives one or more filtering criteria in the form of alphanumeric text in the search bar, which causes one or more digital files to be displayed on the interface based at least in part on the one or more filtering criteria. For example, typing just the letter “a” as a filtering criterion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

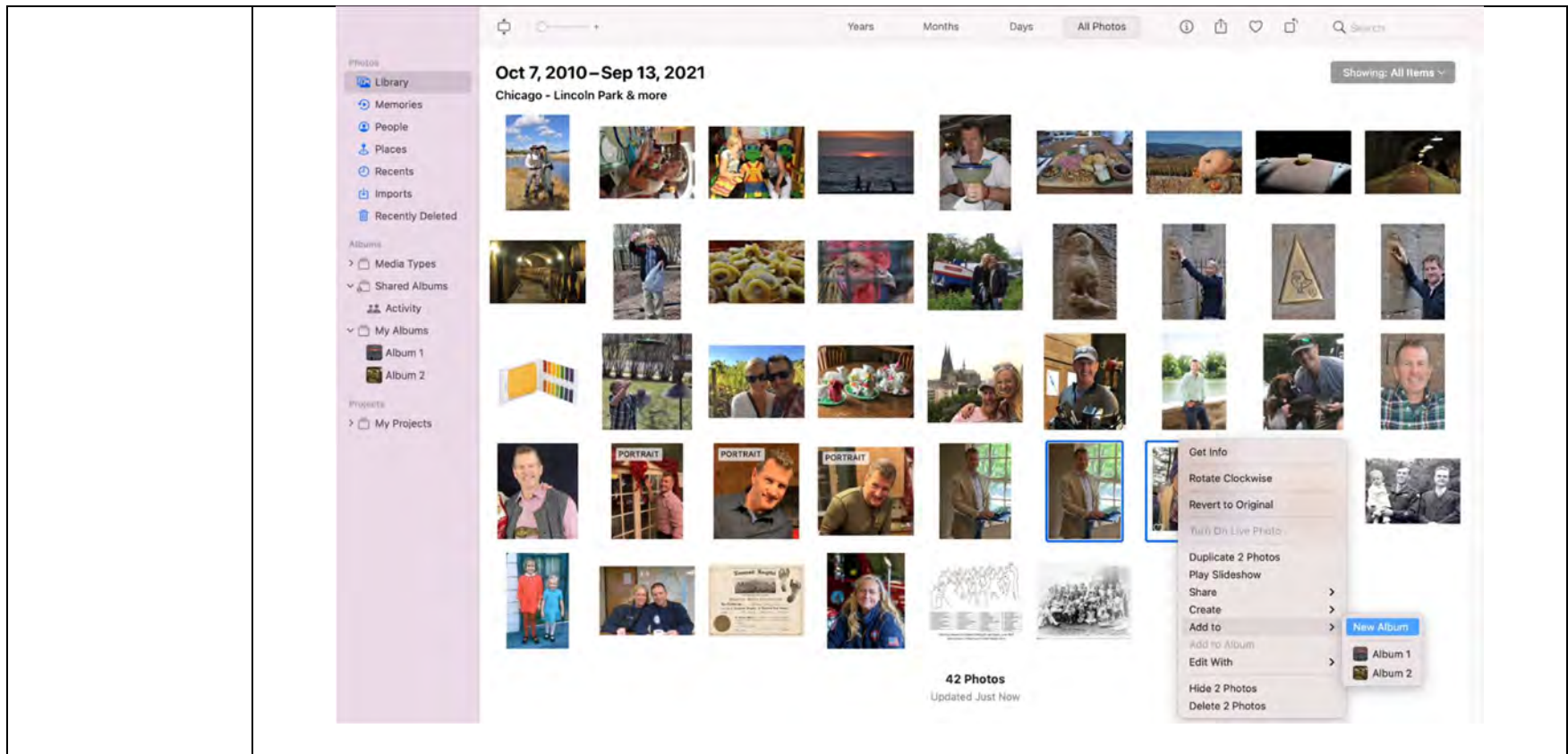
macOS causes a plurality of images to be displayed on the interface.



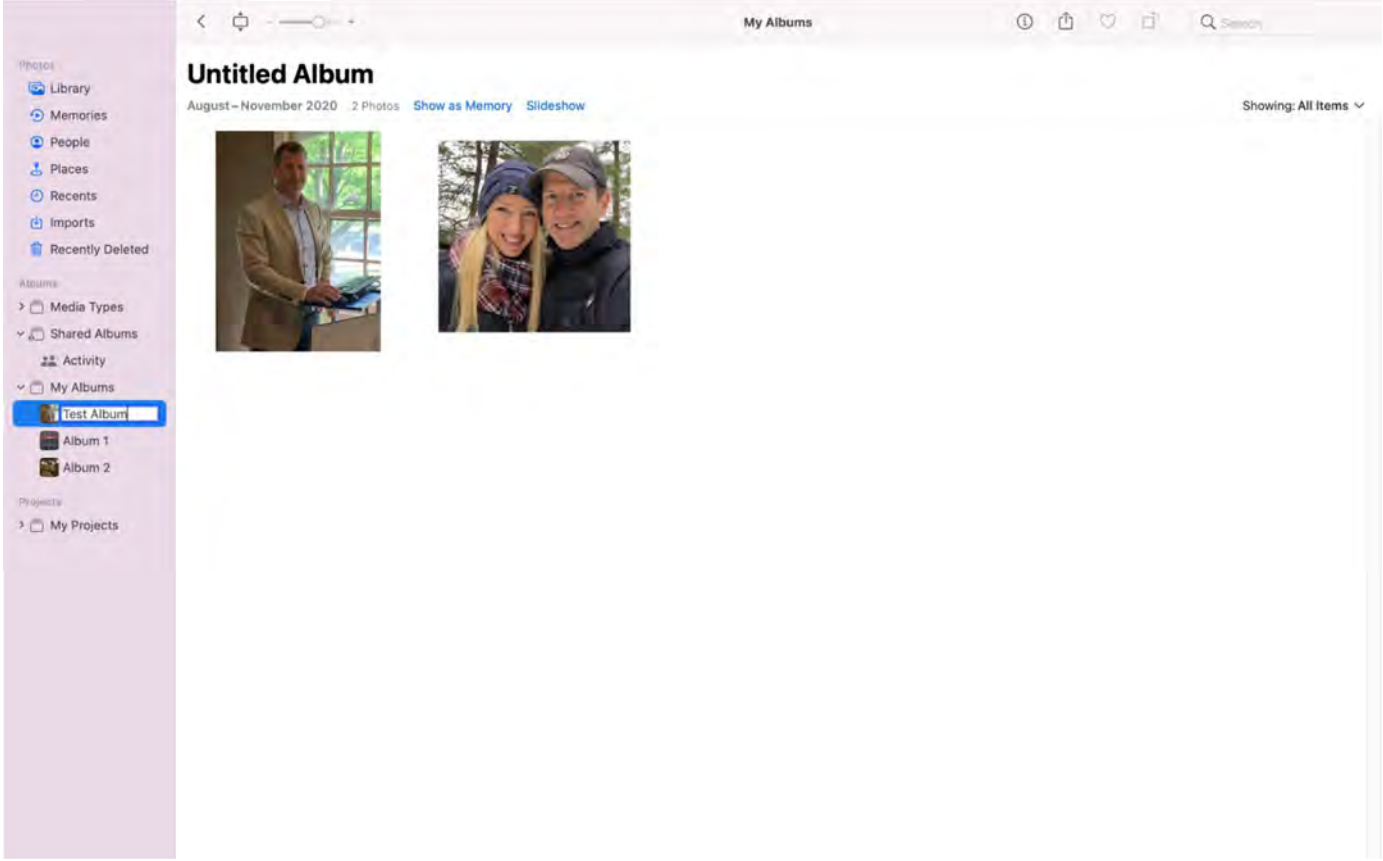
50[b] receiving alphanumeric text as the album name;

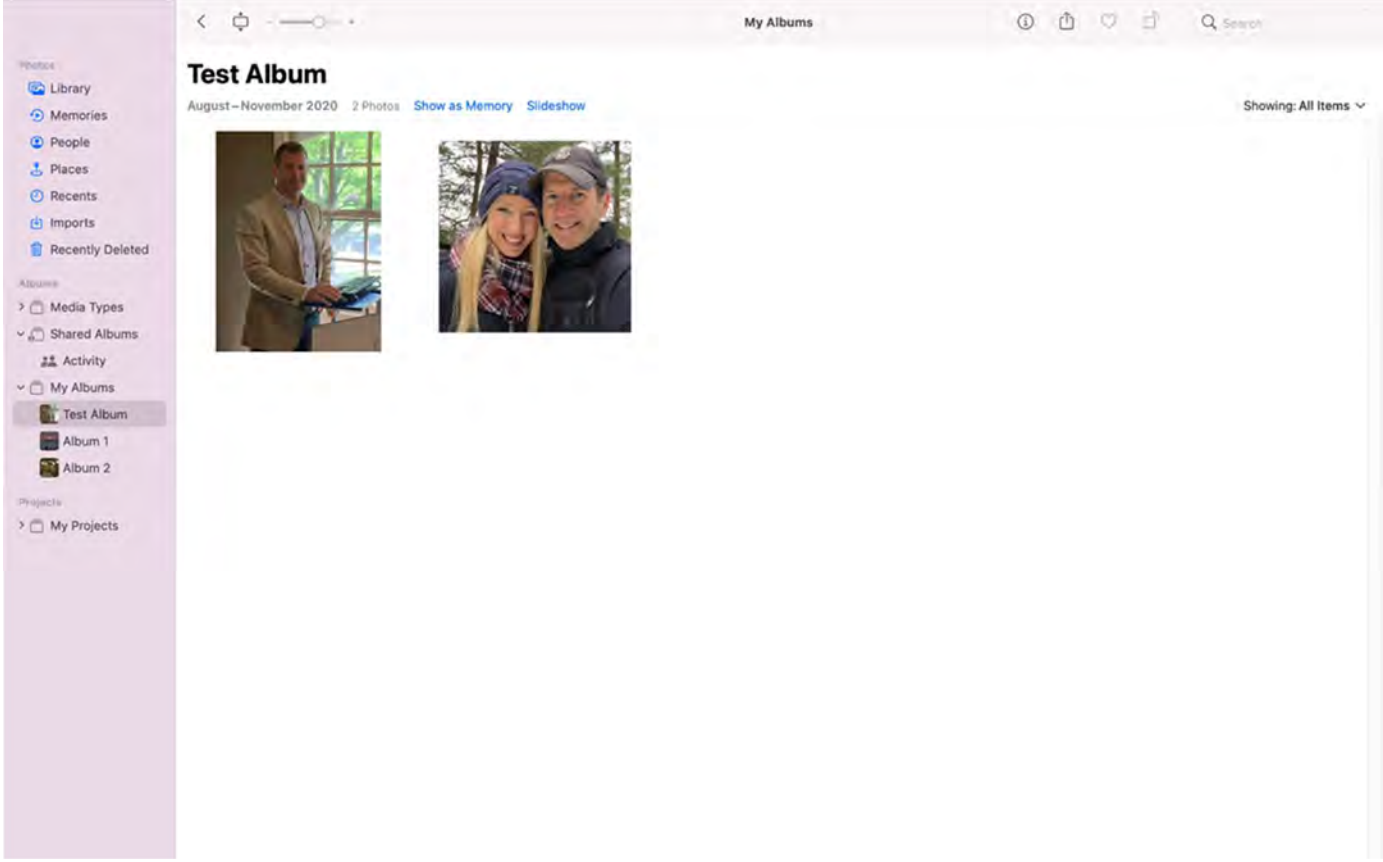
macOS receives alphanumeric text as the album name

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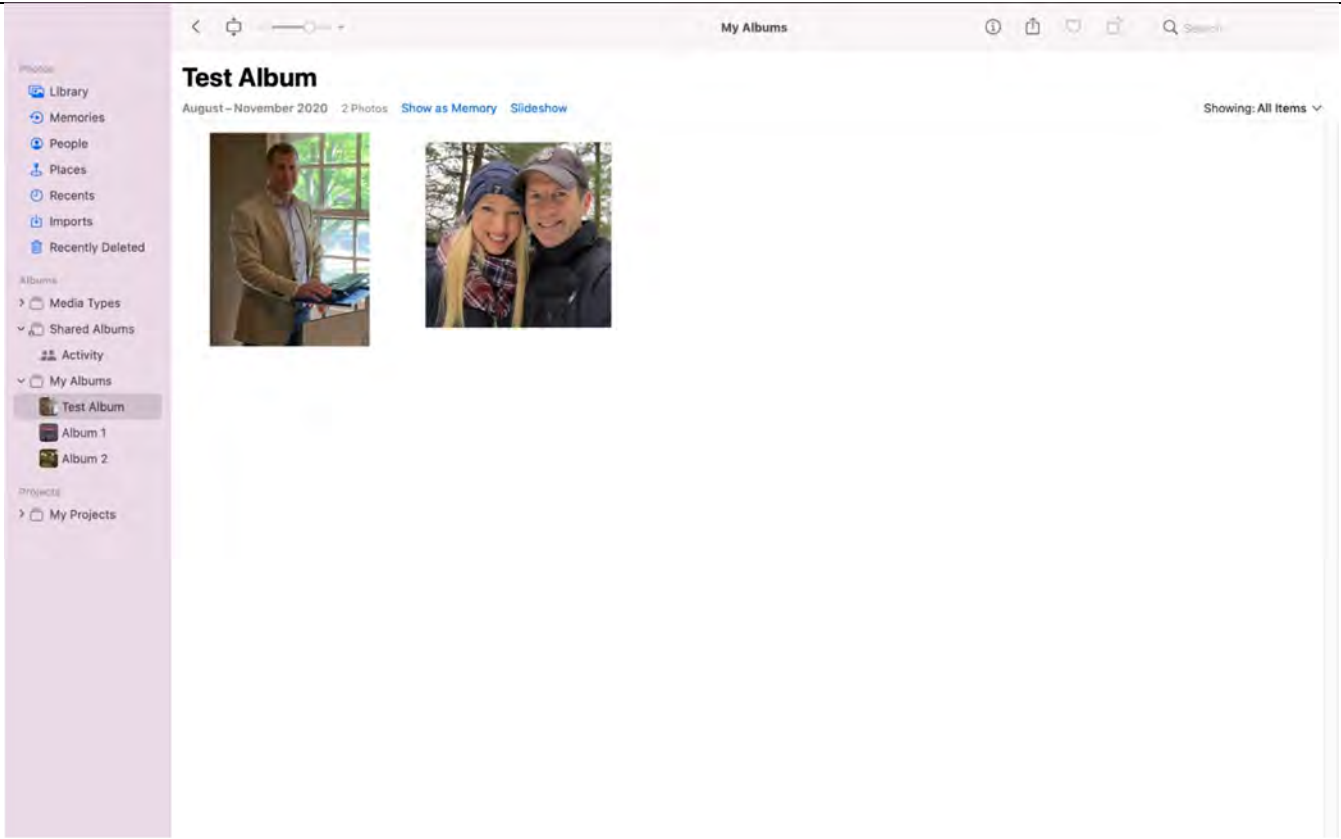


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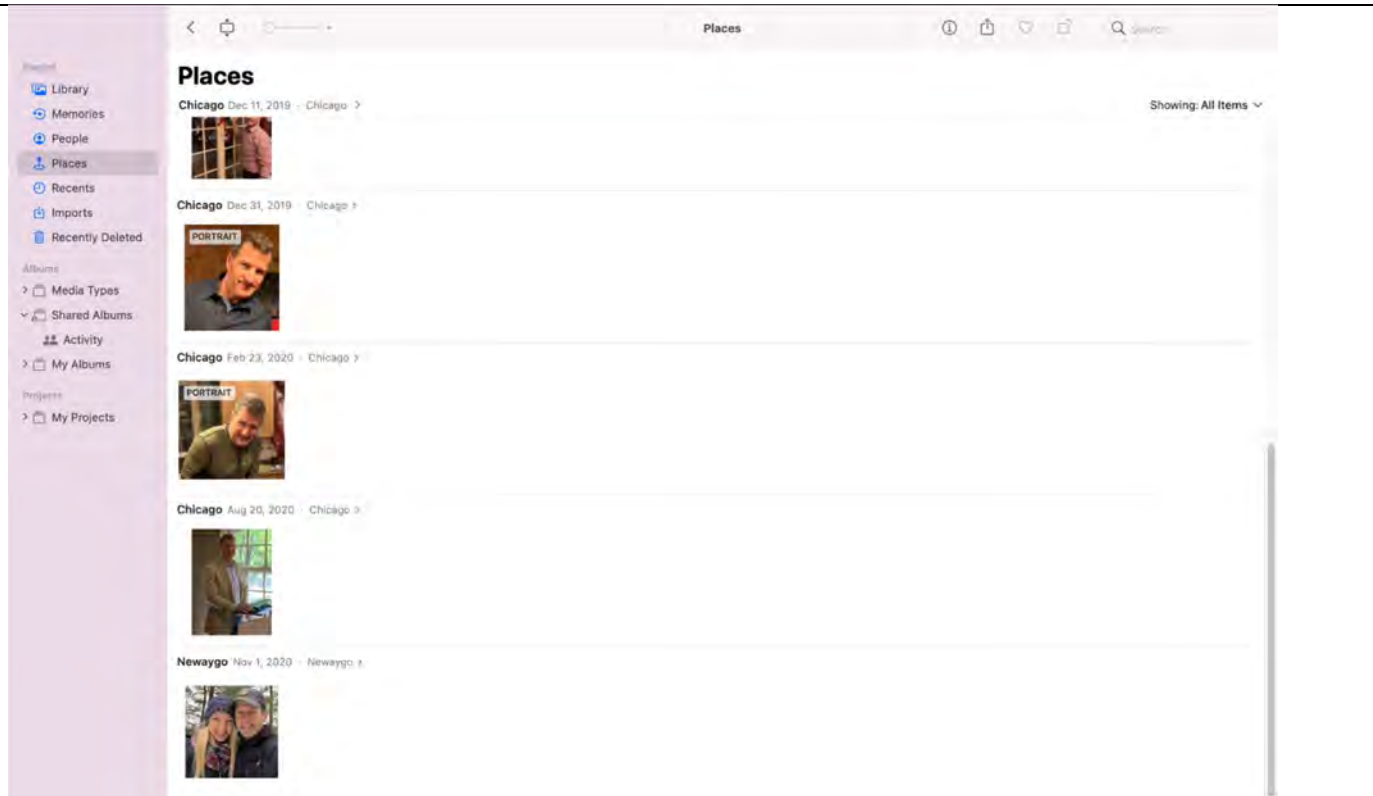
	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: PHOTOS (Library, Memories, People, Places, Recents, Imports, Recently Deleted), ALBUMS (Media Types, Shared Albums, Activity, My Albums), and PROJECTS (My Projects). Under 'My Albums', 'Test Album' is highlighted. 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 album name 'Untitled Album' is positioned above the photos.</p>
<p>50[c] 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 navigation options: 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 shows the 'Test Album' view, which includes the album title 'Test Album', the date range 'August–November 2020', and the number of photos '2 Photos'. Below this, two photo thumbnails are displayed: a man in a suit and a couple. The top right of the interface shows 'My Albums' and a search bar. The bottom right corner of the main area indicates '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>

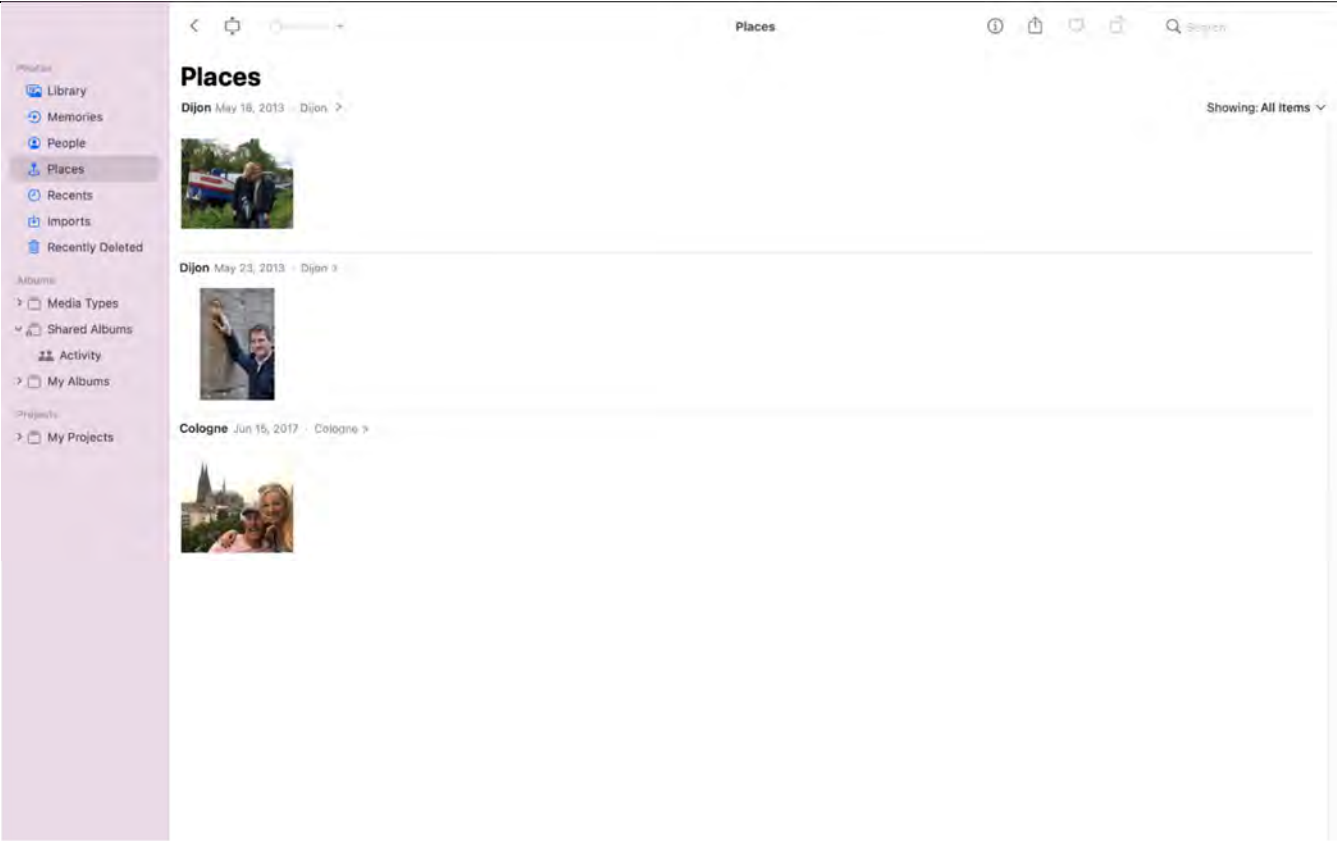


<p>plurality of images.</p>	 <p>The screenshot shows the macOS Photos application interface. On the left is a sidebar with categories: PHOTOS (Library, Memories, People, Places, Recents, Imports, Recently Deleted), ALBUMS (Media Types, Shared Albums, Activity, My Albums), and PROJECTS (My Projects). 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>

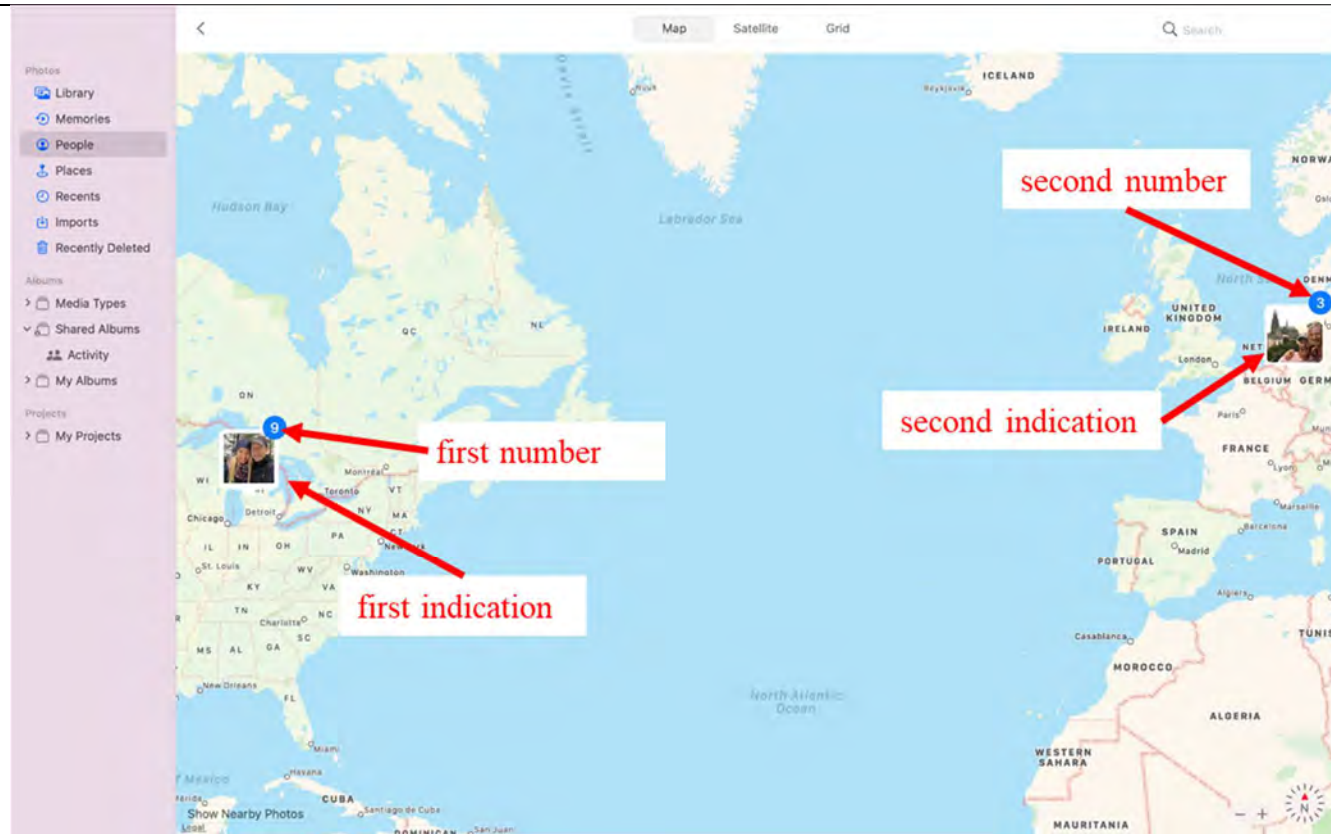
to be displayed on the interface and responsive to a selection associated with the second location, causing the second set of digital files to be displayed on the interface.



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>

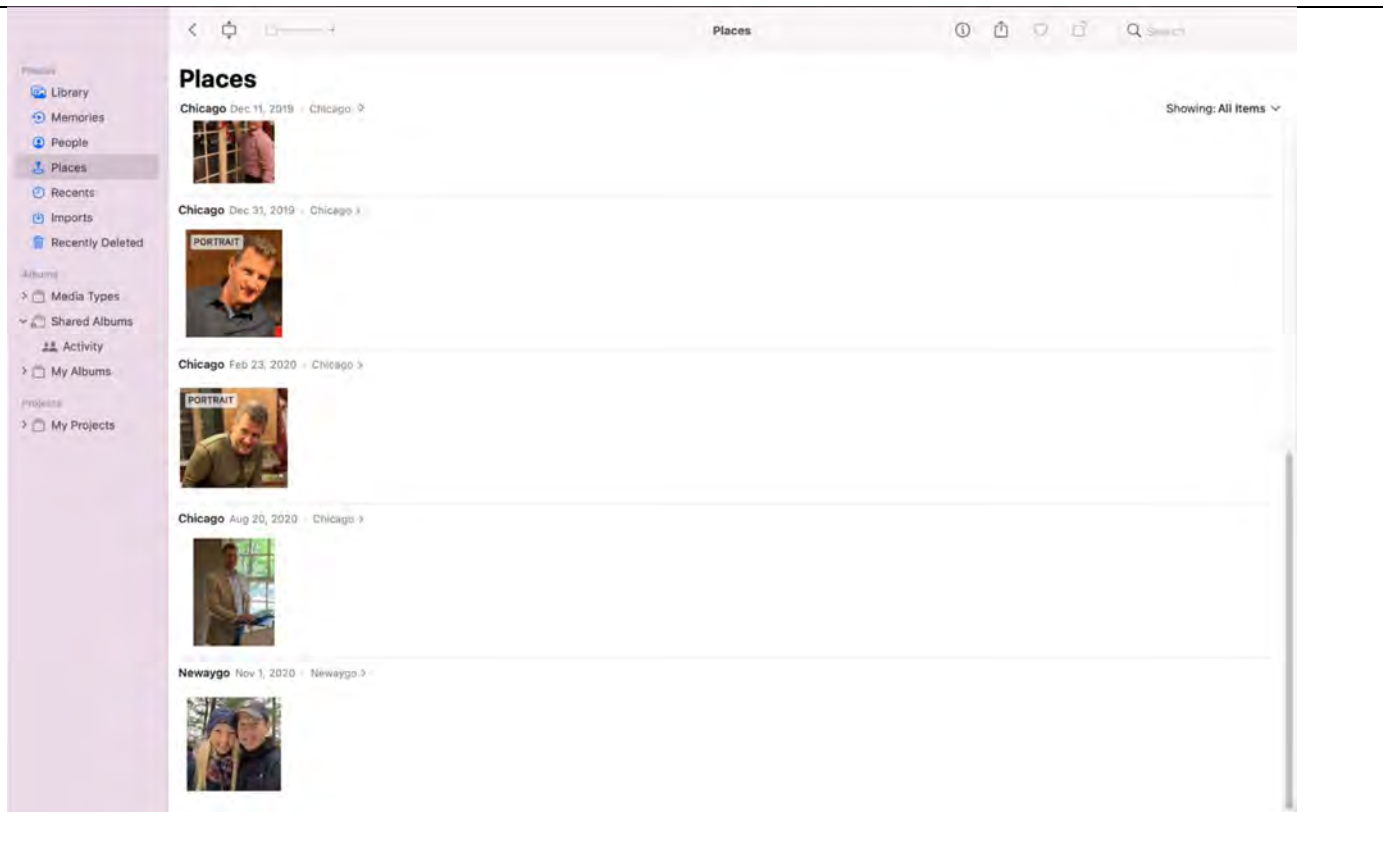
displayed on the interface and (ii) a second number associated with a number of digital files in the second set of digital files to be displayed on the interface.



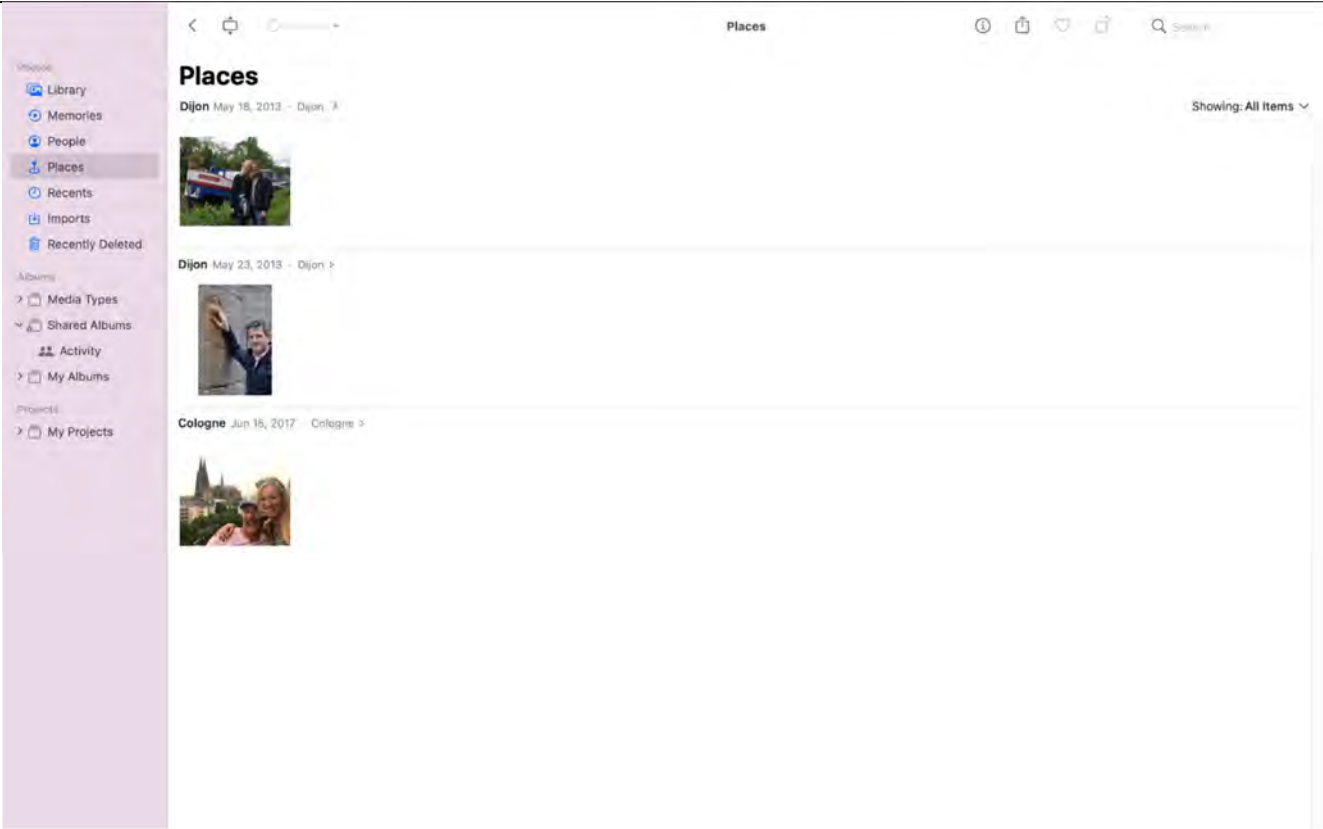
**53.** The method of claim 33, wherein each of the first digital file, the second digital file, the first set of digital files, and the second set of digital files

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.

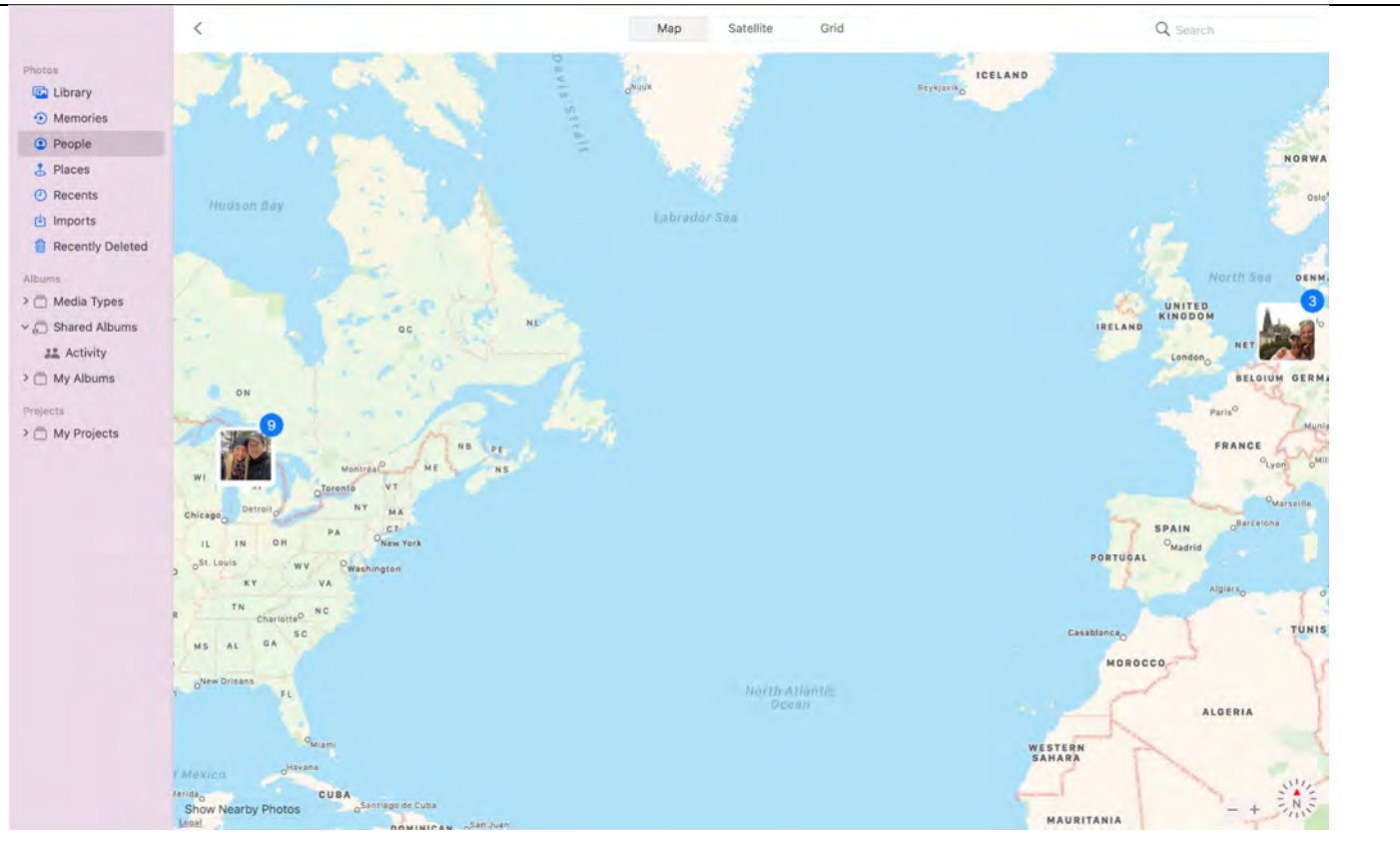
include a photo, a video, or both.

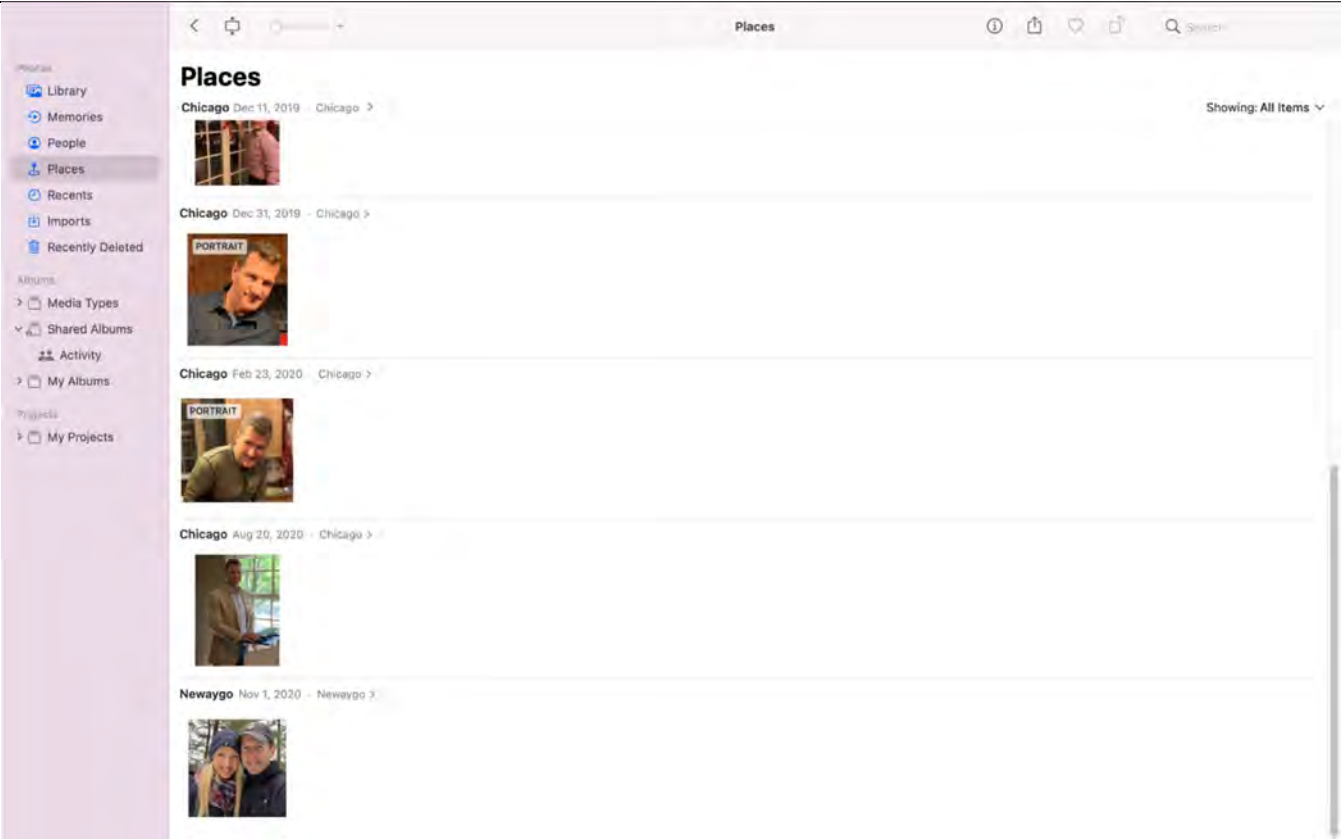


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<p><b>55[pre]</b> The method of claim 51, wherein</p>	<p><i>See information for claim 51.</i></p>
<p><b>55[a]</b> the first set of digital files displayed on the interface responsive to the selection</p>	<p>Each of the digital files in the first set 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>

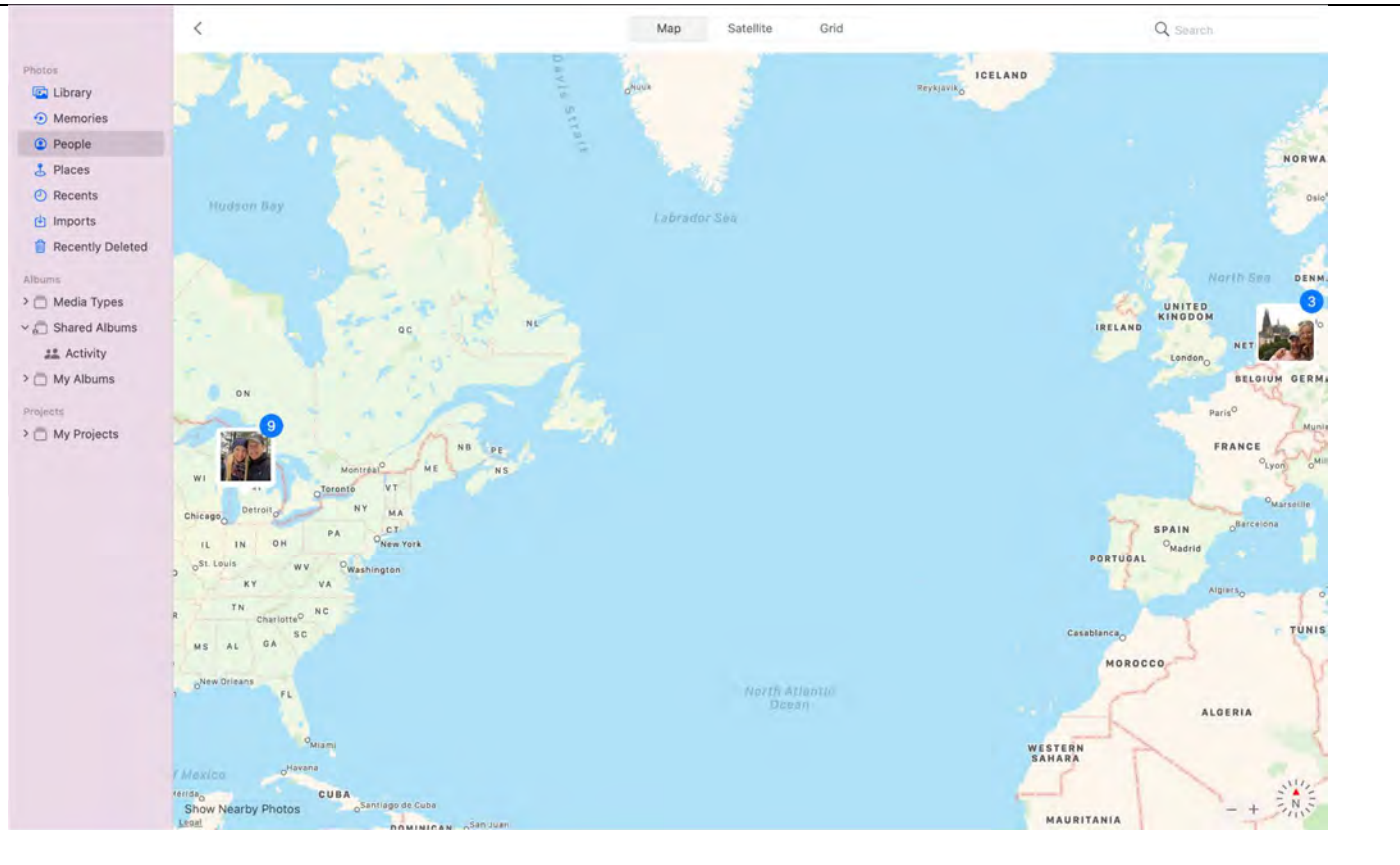
associated with the first location are not overlaid on the interactive geographic map and

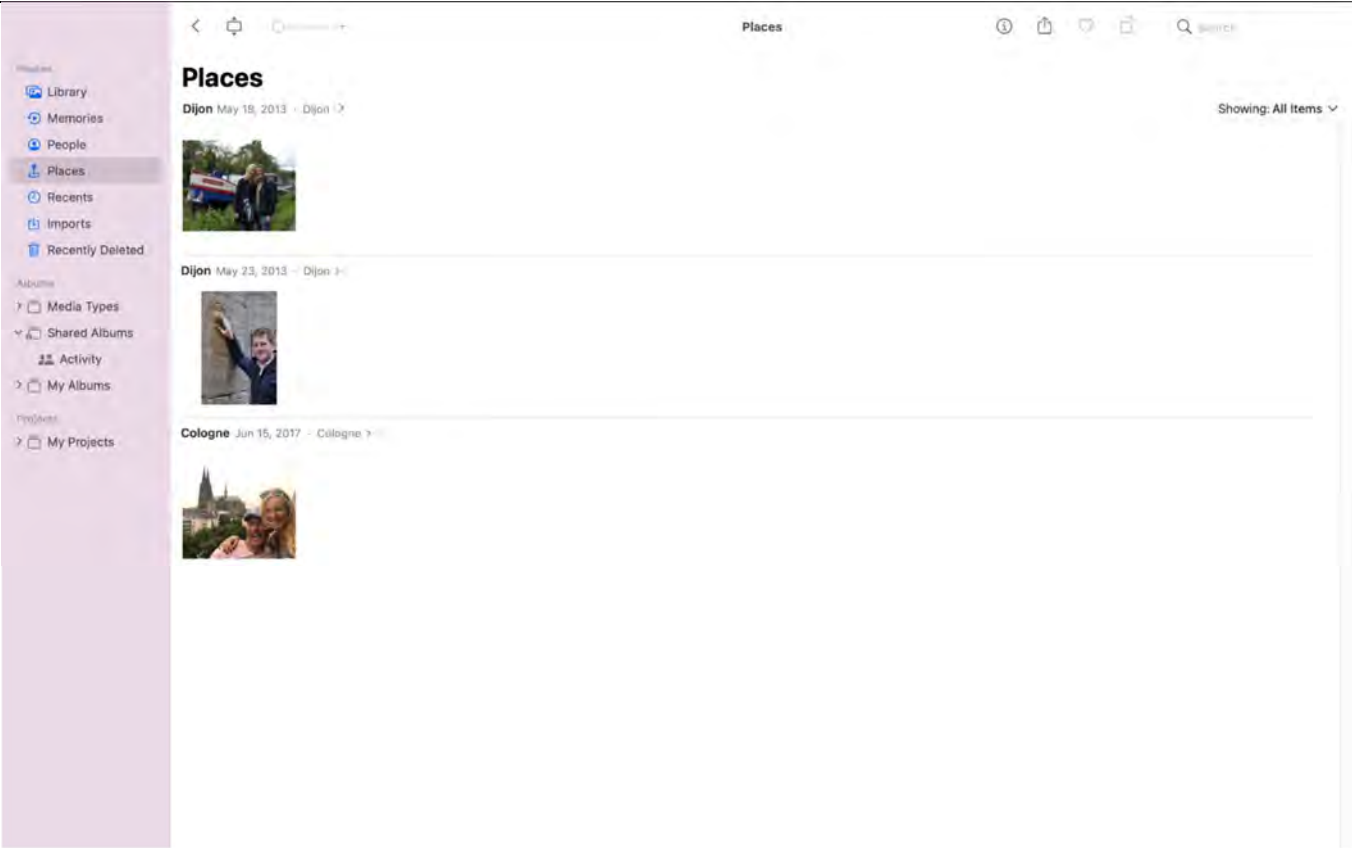


	
<p><b>55[b]</b> the second set of digital files displayed on the interface responsive to the selection associated with the second location are not overlaid on</p>	<p>Each of the digital files in the second set of digital files displayed on the interface responsive to the selection associated with the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

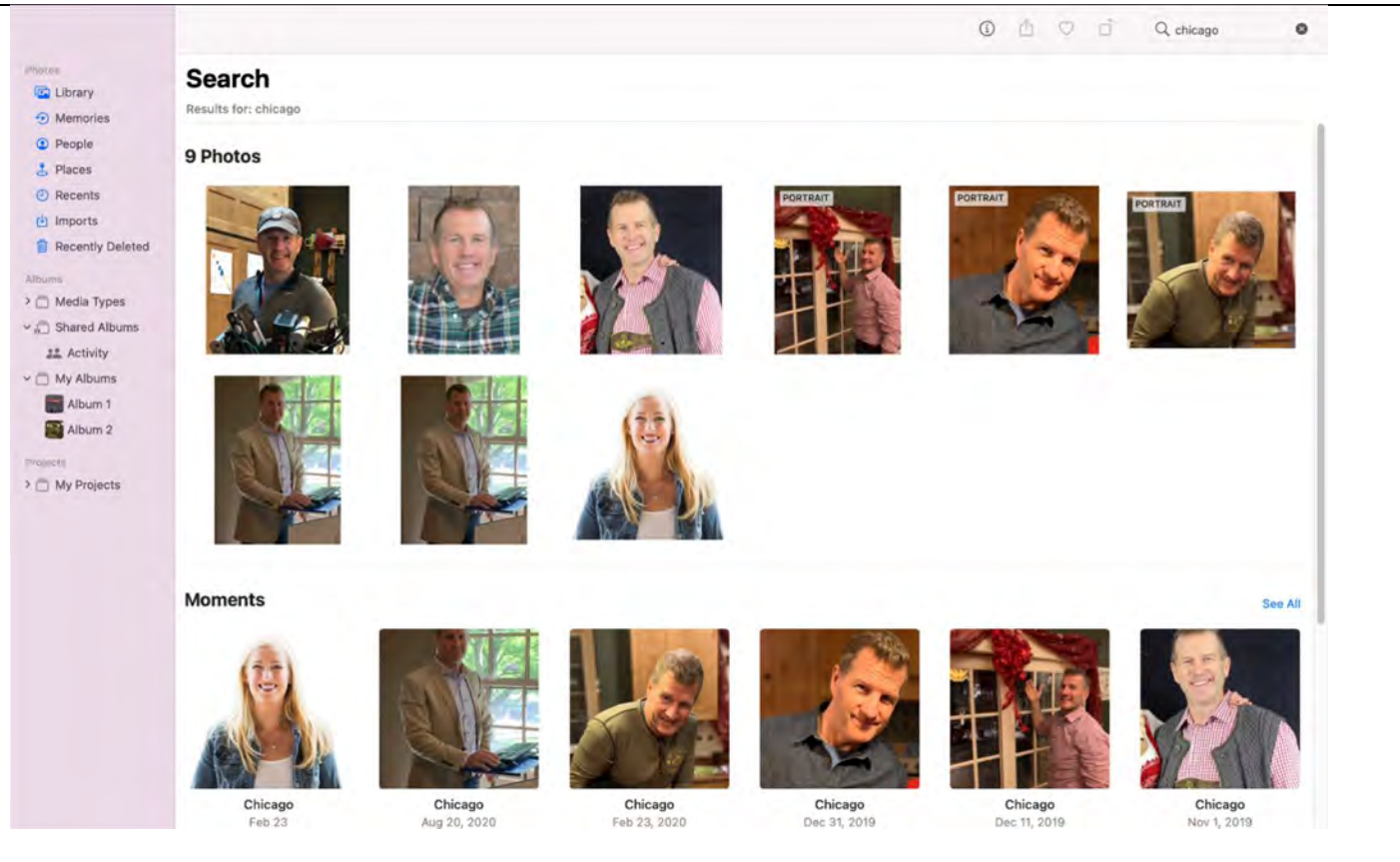


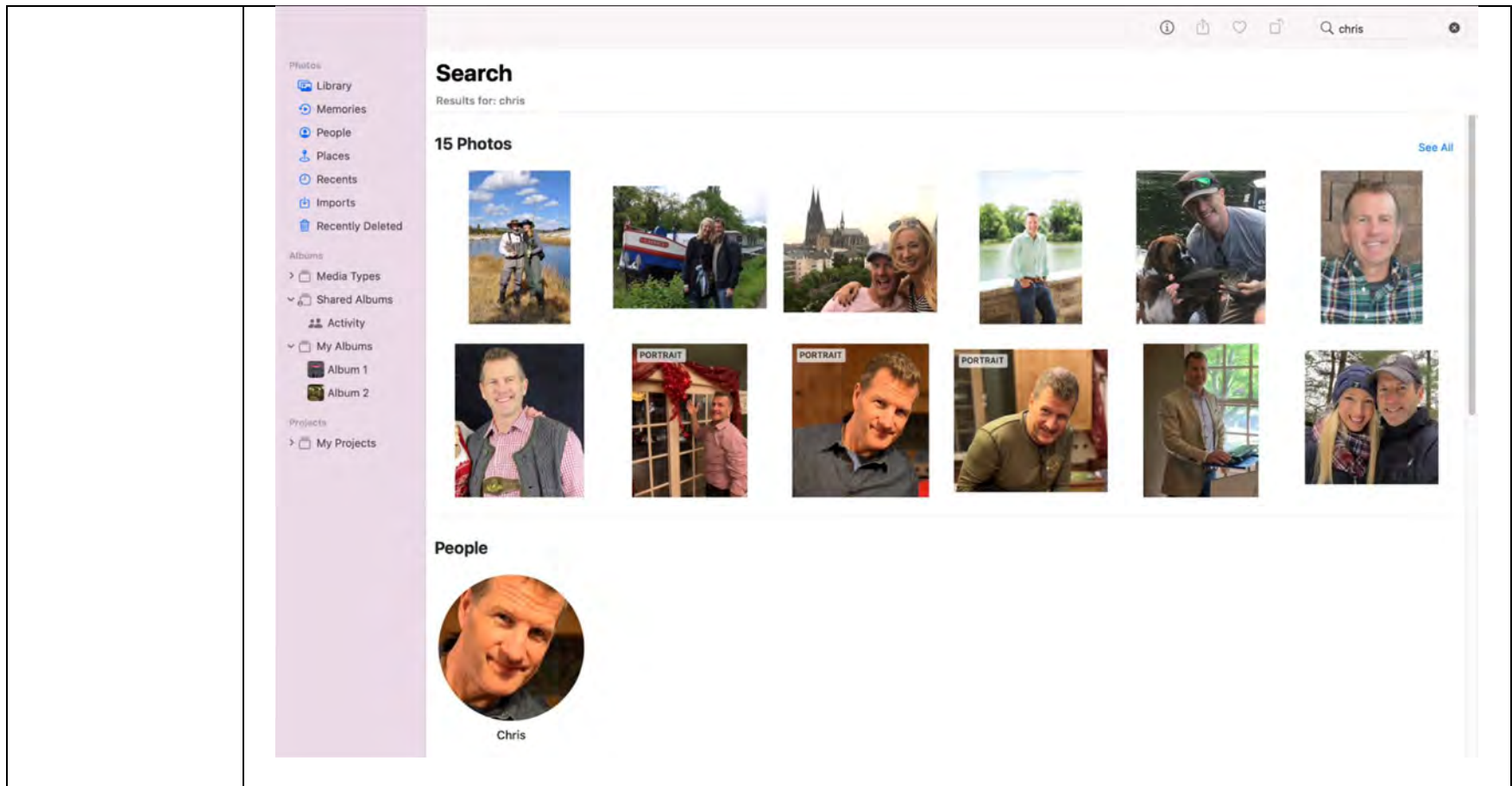
the interactive geographic map.

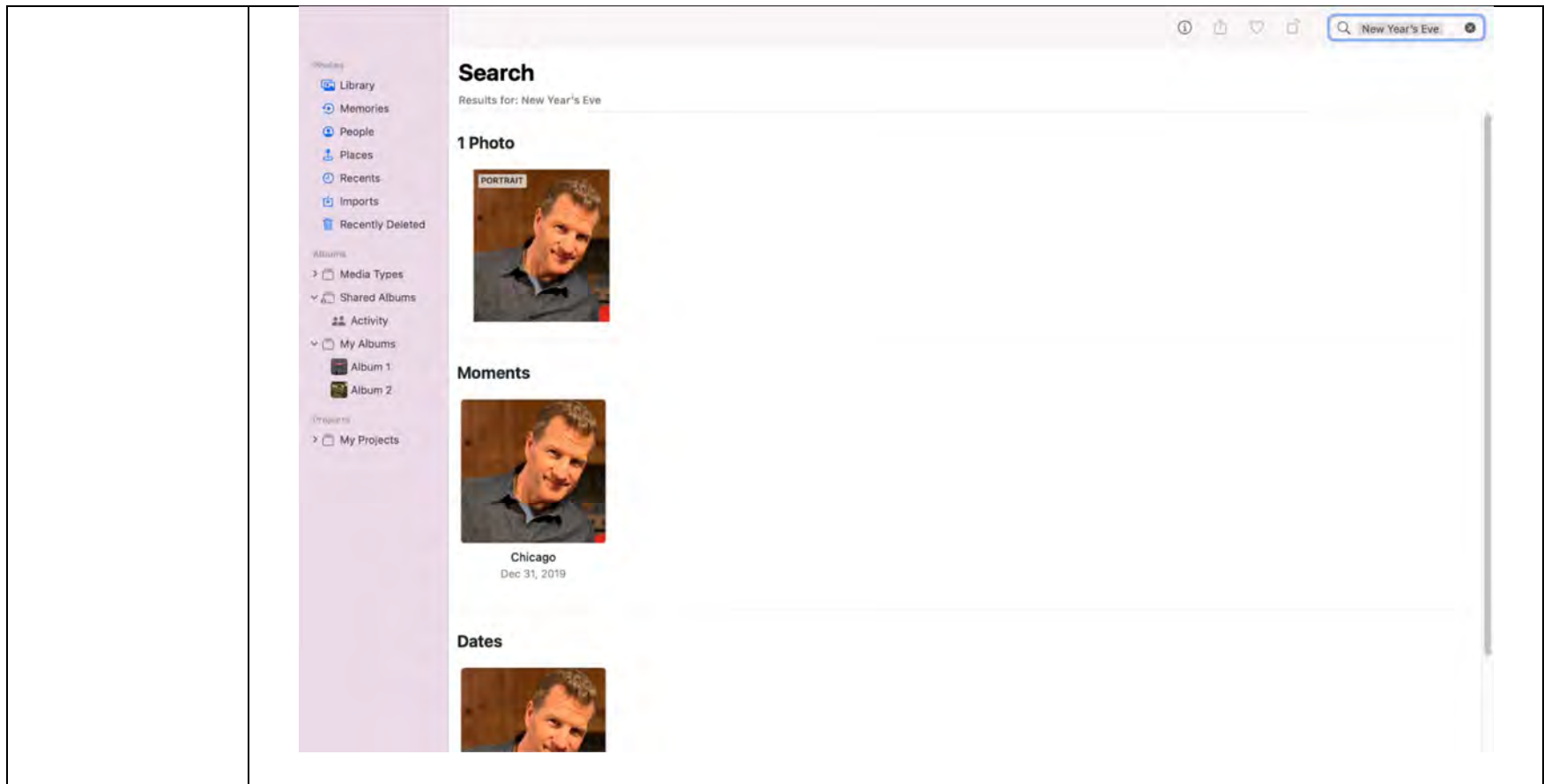


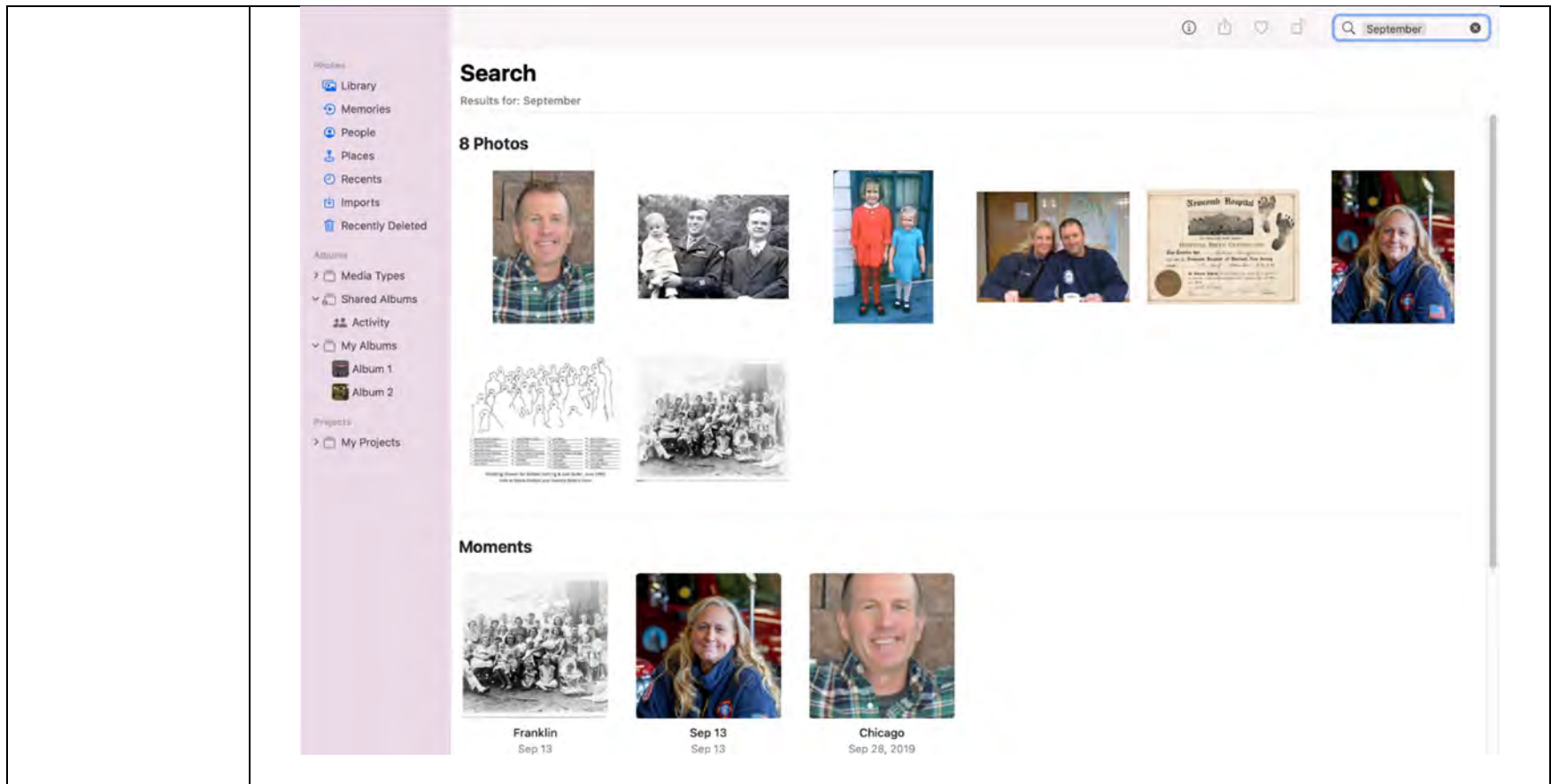
	
<p><b>56.</b> The method of claim 49, wherein the one or more filtering criteria include a keyword, a location, a person, an event, a date, or any</p>	<p>The one or more filtering criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p>

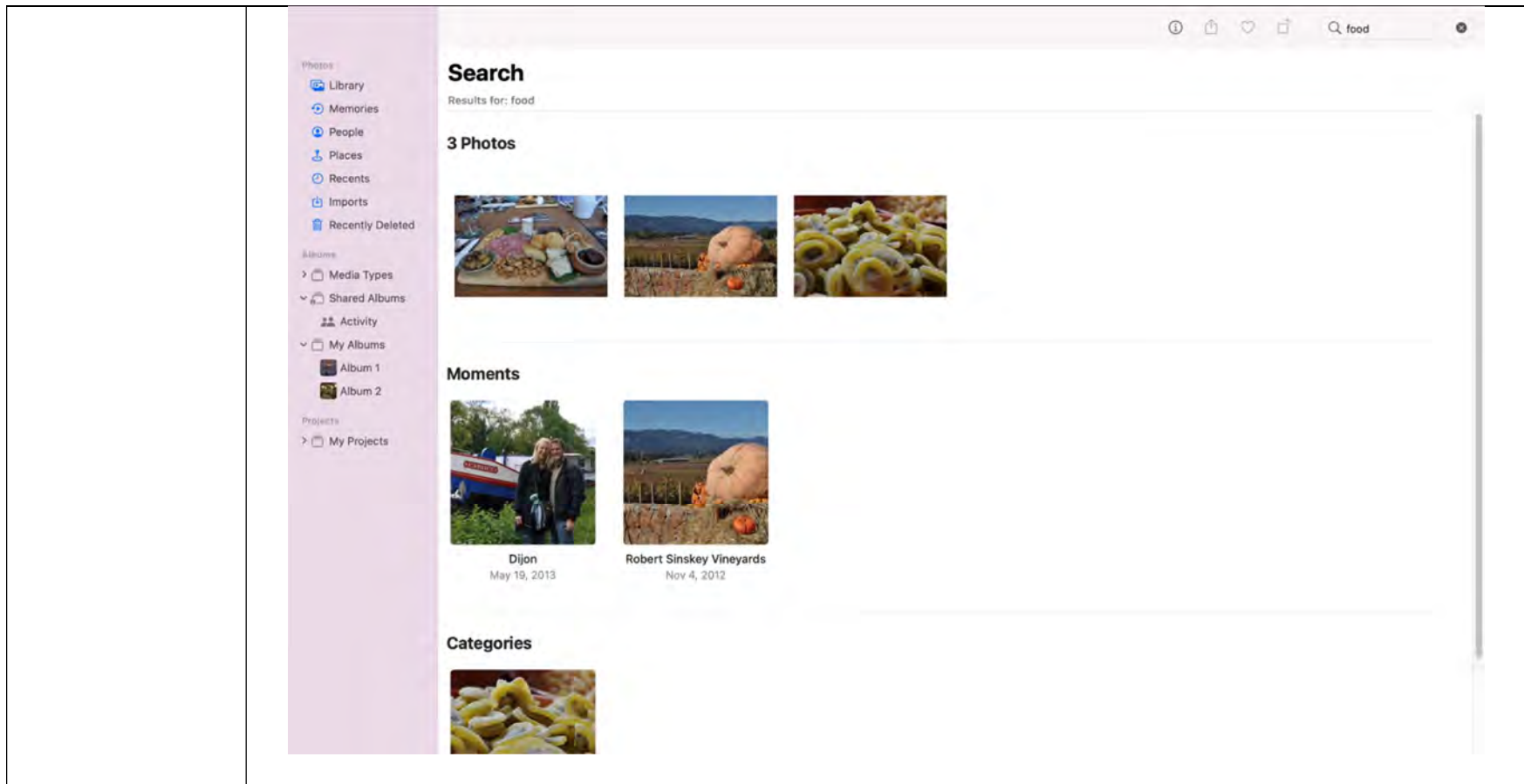
combination thereof.







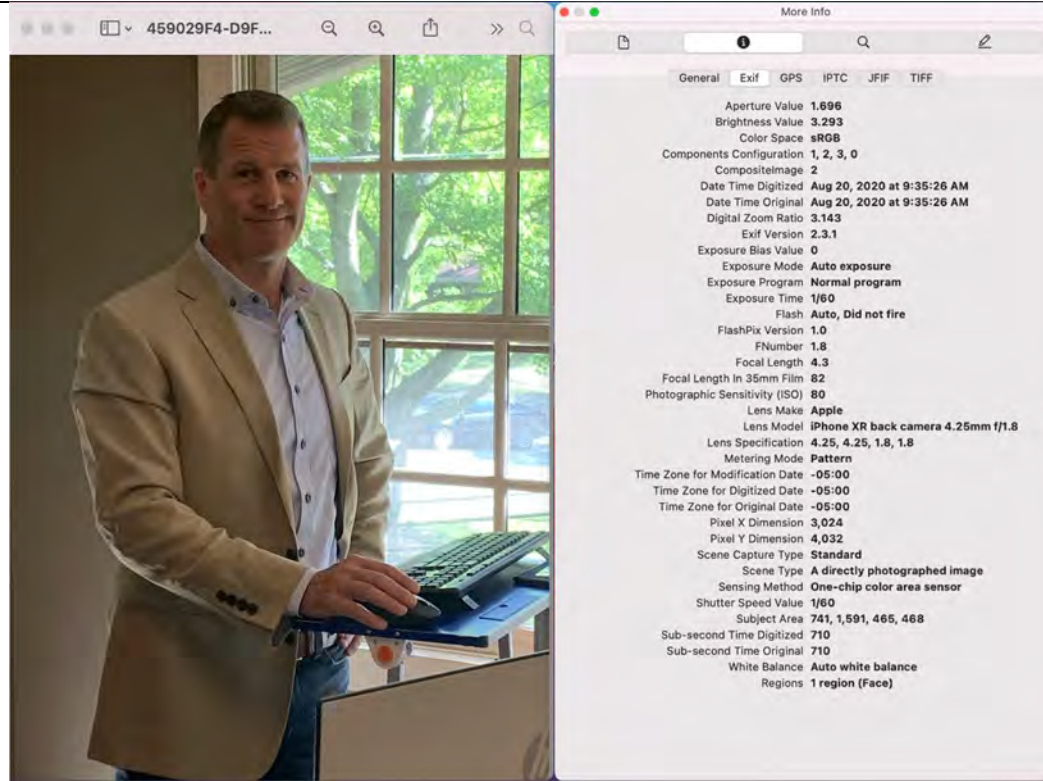




**57.** The method of claim 42, wherein the exporting the first digital file includes exporting exchangeable image file format (EXIF) data

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.

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].



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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].