

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

MEMORYWEB, LLC,
Patent Owner.

Case No. IPR2022-00033
U.S. Patent No. 10,423,658

PETITION FOR *INTER PARTES* REVIEW

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	COMPLIANCE WITH IPR REQUIREMENTS	2
	A. Certification of Standing	2
	B. Mandatory Notices	2
	1. Real Party-in-Interest	2
	2. Related Proceedings	2
	3. Counsel and Service Information.....	3
III.	IDENTIFICATION OF CHALLENGED CLAIMS.....	3
IV.	TECHNICAL BACKGROUND.....	4
	A. Digital Photography and Metadata.....	4
	B. Metadata Standards	4
	C. Photo Organizer Applications and Websites.....	5
	D. Common Features of Photo Applications	6
V.	THE '658 PATENT	8
	A. Effective Filing Date and AIA Status	8
	B. Person of Ordinary Skill in the Art	9
	C. Overview of the '658 Patent.....	9
	D. Prosecution History	11
VI.	CLAIM CONSTRUCTION.....	12
VII.	THE CHALLENGED CLAIMS ARE UNPATENTABLE.....	12
	A. Prior Art Overview	12
	1. A3UM	12
	a. Prior Art Status	12
	b. Overview.....	17
	2. Belitz	21
	3. Rasmussen.....	23

B.	Claims 1-2 and 5-15 Are Obvious Over A3UM and Belitz.....	23
1.	Belitz Suggests Modifying A3UM to Use Photo Thumbnails Instead of Pins in the A3UM Interactive Map	24
2.	Claim 1	30
a.	Preamble	30
b.	Selectable Elements	36
c.	Map View and Interactive Map	37
d.	First and Second Location Selectable Thumbnail Images	40
e.	First and Second Count Values Images	44
f.	First and Second Location Views	47
3.	Claim 2	50
4.	Claim 5	51
a.	People View	51
b.	First and Second Person Selectable Thumbnail Images	52
c.	First and Second Names	58
5.	Claim 6	60
6.	Claims 7 and 10	61
7.	Claims 8 and 11	62
8.	Claims 9 and 12	65
9.	Claim 13	66
a.	Album Selectable Element and Album View	66
b.	First and Second Album Selectable Thumbnail Images	68
c.	First and Second Album Names	71
10.	Claims 14 and 15	72
C.	Claims 3-4 Are Obvious Over A3UM, Belitz, and Rasmussen	75
1.	“Displaying” the “Map Images”	78
2.	“Indicating the Geographic Coordinates”	80

VIII. THE BOARD SHOULD NOT EXERCISE ITS DISCRETION UNDER § 314(a) or § 315(d).....84

A. Section 314(a).....84

1. Factor 1 (Possibility of Stay) is Neutral.....85

2. Factor 2 (Trial Date) Favors Institution.....85

3. Factor 3 (Investment in Parallel Proceedings) Favors Institution86

4. Factor 4 (Overlapping Issues) Favors Institution87

5. Factor 5 (Overlapping Parties) is Outweighed by Other Factors.....87

6. Factor 6 (Strength of Petition and Other Considerations) Favors Institution88

B. Section 325(d)89

IX. CONCLUSION89

Exhibit List91

Certificate of Compliance.....95

Certificate of Service.....96

I. INTRODUCTION

Petitioner Apple Inc. (“Apple”) requests *inter partes* review of claims 1-15 (“challenged claims”) of U.S. Patent No. 10,423,658 (“’658 patent”). The ’658 patent claims digital photo management methods that use well-known user interface elements to select and display desired photos using a “map view” showing the location where photos were taken. The prior art, however, described photo management systems with these interface elements before early 2011. Most notably, A3UM—not considered during examination—describes a photo management system that allows users to select and view digital photos and videos using locations on an interactive map (“Places”). In fact, the only potential distinction between the ’658 patent claims and A3UM involves the *style* of markers used on the interactive map: A3UM uses pins, while the ’658 patent requires “thumbnail images.” That distinction cannot render the claims patentable: Belitz demonstrates that using thumbnail images on interactive maps to select and display photos was a conventional technique in analogous photo management systems.

Because the evidence demonstrates that the ’658 patent claims are obvious based on A3UM in view of Belitz, the Board should institute *inter partes* review.

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