

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD,
Petitioner,

v.

MEMORYWEB, LLC,
Patent Owner.

Case IPR2022-00221
Patent 10,423,658

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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UPDATED EXHIBIT LIST

- SAMSUNG-1001 U.S. Patent No. 10,423,658 to Christopher J. Desmond, et al. (“the ’658 patent”)
- SAMSUNG-1002 Excerpts from the Prosecution History of the ’658 Patent (“the Prosecution History”)
- SAMSUNG-1003 Declaration of Dr. Philip Greenspun
- SAMSUNG-1004 Curriculum Vitae of Dr. Philip Greenspun
- SAMSUNG-1005 U.S. Patent App. Pub. No. 2011/0122153 A1 (“Okamura”)
- SAMSUNG-1006 U.S. Patent App. Pub. No. 2010/0058212 A1 (“Belitz”)
- SAMSUNG-1007 U.S. Patent App. Pub. No. 2006/0206264 A1 (“Rasmussen”)
- SAMSUNG 1008-SAMSUNG 1019 RESERVED
- SAMSUNG-1020 Tim Grey, Adobe Photoshop Lightroom Workflow: The Digital Photographer's Guide (2007)
- SAMSUNG-1021 U.S. Patent App. Pub. No. 2011/0074811 A1 (“Hanson”)
- SAMSUNG-1022 Stephen Shankland, “What’s the best Web site for geotagged photos?,” CNET (Mar. 18, 2009), available at <https://www.cnet.com/tech/computing/whats-the-best-web-site-for-geotagged-photos/>
- SAMSUNG-1023 Panoramio, “Embedding a Panoramio map into your web page” (Archive.org: Mar. 28, 2010), available at <https://web.archive.org/web/20100328215828/http://www.panoramio.com:80/help/embedding>
- SAMSUNG-1024 Shu-Wai Chow, PHP Web 2.0 Mashup Projects, Packt Publishing (2007)

- SAMSUNG-1025 Complaint for Declaratory Judgment, *MyHeritage (USA), Inc. et al. v. MemoryWeb, LLC*, Case No. 1:21-cv-02666, Dkt. 1 (N.D. Ill. May 17, 2021)
- SAMSUNG-1026 U.S. Patent App. Pub. No. 2009/0113350 A1 (“Hibino”)
- SAMSUNG-1027 U.S. Patent App. Pub. No. 2006/0165380 A1 (“Tanaka”)
- SAMSUNG-1028 Complaint for Infringement, *MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 21-cv-411 (W.D. Tex.)
- SAMSUNG-1029 Plaintiff MemoryWeb, LLC’s First Supplemental Initial Infringement Contentions, *MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 21-cv-411-ADA (W.D. Tex. Nov. 24, 2021)
- SAMSUNG-1030 Agreed Scheduling Order, *MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 21-cv-411-ADA (W.D. Tex. Nov. 23, 2021)
- SAMSUNG-1031 U.S. Patent No. 6,215,523 (“Anderson”)
- SAMSUNG-1032 U.S. Patent App. Pub. No. 2008/0133526 (“Haitani”)
- SAMSUNG-1033 U.S. Patent App. Pub. No. 2008/0306921 (“Rothmuller”)
- SAMSUNG-1034 U.S. Patent App. Pub. No. 2013/0198602 (“Kokemohr”)
- SAMSUNG-1035 U.S. Patent App. Pub. No. 2013/0326338 (“Secord”)
- SAMSUNG-1036 U.S. Patent App. Pub. No. 2007/0016575 (“Hurst-Hiller”)
- SAMSUNG-1037 Stipulation Letter
- SAMSUNG-1038 U.S. Patent App. Pub. No. 2008/0276279 (“Gossweiler”)
- SAMSUNG-1039 U.S. Patent App. Pub. No. 2008/0263103 (“McGregor”)

- SAMSUNG-1040 U.S. Patent App. Pub. No. 2006/0080342 (“Takaki”)
- SAMSUNG-1041 U.S. Patent App. Pub. No. 2009/0210793 (“Yee”)
- SAMSUNG-1042 Woody Leonhard, Windows Vista All-in-One Desk Reference for Dummies (2007)
- SAMSUNG-1043 Andy Rathbone, Windows Visa for Dummies (2007)
- SAMSUNG-1044 Email from Board Authorizing Petitioner’s Reply
- SAMSUNG-1045 Transcript of the deposition of Dr. Glenn Reinman dated November 16, 2022
- SAMSUNG-1046 Transcript of the deposition of Dr. Glenn Reinman dated January 24, 2023
- SAMSUNG-1047 Second Declaration of Dr. Philip Greenspun
- SAMSUNG-1048 Adam C. Engst, Visual Quickstart Guide iPhoto ’09 (2009) (“Engst”)
- SAMSUNG-1049 U.S. Patent App. Pub. No. 2009/0196510 (“Gokturk”)
- SAMSUNG-1050 IPR2022-00222, Paper 12, Institution Decision

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