

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

MEMORYWEB, LLC,
Patent Owner.

Case No. IPR2022-00031
U.S. Patent No. 10,621,228

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	7
V.	THE '228 PATENT	9
	A. Effective Filing Date and AIA Status	9
	B. Person of Ordinary Skill in the Art	9
	C. Overview of the '228 Patent.....	9
	D. Prosecution History	12
VI.	CLAIM CONSTRUCTION.....	12
VII.	THE CHALLENGED CLAIMS ARE UNPATENTABLE.....	13
	A. Prior Art Overview	13
	1. A3UM	13
	a. Prior Art Status	13
	b. Overview.....	17
	2. Belitz	22
	B. Claims 1-19 Are Obvious Over A3UM and Belitz.....	24

- 1. Belitz Suggests Modifying A3UM to Use Photo Thumbnails Instead of Pins in the A3UM Interactive Map24
- 2. Claim 131
 - a. Preamble and Map View31
 - b. First and Second Location Selectable Thumbnail Images35
 - c. First and Second Location Views.....39
 - d. People View.....44
 - e. First and Second Person Selectable Thumbnail Images.46
 - f. First and Second Names53
- 3. Claims 2 and 5.....55
- 4. Claims 3 and 6.....58
- 5. Claims 4 and 7.....59
- 6. Claims 8 and 9.....60
- 7. Claim 10.....62
- 8. Claim 1164
- 9. Claim 12.....67
- 10. Claim 13.....68
- 11. Claim 14.....70
- 12. Claim 15.....72
- 13. Claim 16.....73
- 14. Claim 17.....76
- 15. Claims 18 and 19.....78

VIII. THE BOARD SHOULD NOT EXERCISE ITS DISCRETION UNDER § 314(a) or § 315(d).....79

- A. Section 314(a).....80
 - 1. Factor 1 (Possibility of Stay) is Neutral.....80
 - 2. Factor 2 (Trial Date) Favors Institution.....80

3. Factor 3 (Investment in Parallel Proceedings) Favors Institution82

4. Factor 4 (Overlapping Issues) Favors Institution82

5. Factor 5 (Overlapping Parties) is Outweighed by Other Factors83

6. Factor 6 (Strength of Petition and Other Considerations) Favors Institution83

B. Section 325(d)85

IX. CONCLUSION85

Exhibit List86

Certificate of Compliance.....90

Certificate of Service.....91

I. INTRODUCTION

Petitioner Apple Inc. (“Apple”) requests *inter partes* review of claims 1-19 (“challenged claims”) of U.S. Patent No. 10,621,228 (“’228 patent”). The ’228 patent claims digital photo management methods that use two well-known user interface elements to select and display desired photos: (i) a “map view” showing the location where photos were taken and (ii) a “people view” that uses faces of people to select and display digital photos containing those people. Patent Owner MemoryWeb LLC secured allowance of the challenged claims over unrelated prior art by adding a “People view” requirement to its claims.

The prior art, however, described photo management systems with both 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 using locations on an interactive map (“Places”) and by individuals in digital images (“Faces”). The only potential distinction between the ’228 patent claims and A3UM involves the *style* of markers used on the interactive map: A3UM uses pins, while the ’228 patent requires “thumbnail images.” That distinction cannot render the claims patentable, as Belitz teaches using thumbnail images on interactive maps to select and display photos.

Because the evidence demonstrates that the ’228 patent claims are obvious based on A3UM in view of Belitz, the Board should institute *inter partes* review.

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