

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD,  
Petitioner,

v.

MEMORYWEB, LLC,  
Patent Owner.

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IPR2022-00221  
Patent 10,423,658 B2

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Record of Oral Hearing  
Held Virtually: May 9, 2023

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Before LYNNE H. BROWNE, NORMAN H. BEAMER, and  
KEVIN C. TROCK, *Administrative Patent Judges*.

IPR2022-00221  
Patent 10,423,658 B2

APPEARANCES:

ON BEHALF OF THE PETITIONER:

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ALSO PRESENT, OBSERVING:

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Samsung Electronics Co., LTD

The above-entitled matter came on for hearing on Tuesday, May 9, 2023, commencing at 1:00 p.m., via video teleconference.

1 PROCEEDINGS

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3 JUDGE BROWNE: Good afternoon, everybody. This is Judge  
4 Browne, and we are here for oral argument in IPR2022-00221. With me are  
5 Judges Beamer and Trock, and before we begin, I have a few housekeeping  
6 items. This is a video conference. We ask that you identify yourself before  
7 speaking, and if you are referring to a demonstrative, please state the number  
8 of the Slide that you are referring to. There is a court reporter in attendance.  
9 We request that counsel remain for a few minutes after the arguments are  
10 submitted in case the court reporter has questions.

11 Each party has 60 minutes of argument time. Patent Owner's  
12 counsel also includes a LEAP practitioner, so patent owner will be given an  
13 additional 15 minutes of time. Please indicate how much time you would  
14 like to reserve for rebuttal after making your appearance, and also as a  
15 reminder -- oh, wait, sorry that's for a different case. So, let's begin. We're  
16 on the record, and please let me know who is here for Petitioner.

17 MR. MONALDO: Good afternoon, Your Honor, this is Jeremy  
18 Monaldo representing Petitioner, Samsung. I'm joined here by Karl Renner  
19 and Hyun Jin In, and we have Jong Choi from Samsung on the public line.

20 JUDGE BROWNE: Great. Do you know how much time you  
21 would like to reserve for your rebuttal?

22 MR. MONALDO: Sure, Your Honor, we'd like to reserve 30  
23 minutes.

24 JUDGE BROWNE: All right. And then who is here for Patent  
25 Owner?

26 MS. HAYES: Good afternoon, Your Honor. It's Jennifer Hayes

1 from Nixon Peabody for Patent Owner, and with me today is Angelo  
2 Christopher, and Angelo is the LEAP practitioner for Patent Owner.

3 JUDGE BROWNE: Okay. As you know, Angelo can speak as  
4 much or as little as you would like, and also, you are welcome to advise him  
5 when he is speaking. Do you know at this point how much rebuttal time you  
6 would like, or do you want to wait until you begin your case?

7 MS. HAYES: We'd like to reserve 20 minutes for rebuttal.

8 JUDGE BROWNE: Okay. Great. I will make every effort to let  
9 you know when your time is nearly up, but please also try to keep track of  
10 your time. We'll begin with Petitioner, and Mr. Monaldo, you can begin  
11 when you're ready.

12 MR. MONALDO: Thank you, Your Honors. So, I'll direct you to  
13 Slide 2 of our demonstratives. On Slide 2 you'll see that we offer a table of  
14 contents that will allow you to quickly identify content in our Slides that is  
15 relevant to the various issues involved in this proceeding. These issues  
16 should look familiar as we previously discussed the first, third, and fourth  
17 issues in the oral hearing for MemoryWeb's related to 228 patent.

18 The second issue relates to display of an application view which is  
19 unique to this proceeding. It's something we have not previously discussed.  
20 Without background, unless there are any questions on the outset, I'll move  
21 to Slide 12 to briefly discuss the first issue which relates to the combination  
22 of Okamura and Belitz. So, given the limited time we have together today,  
23 and the fact that we already discussed Okamura and Belitz references in a  
24 prior hearing, I simply wanted to briefly touch on the combination to explain  
25 how we offered multiple theories for how the combination comes together,  
26 and to ensure that I answer any questions that Your Honors might have on

1 the combination.

2 I'll start with Slide 14 to provide a brief overview of the relevant  
3 portion of Okamura. As shown on Slide 14, Okamura describes an  
4 interactive map, and on that map displays clusters to depict locations on the  
5 map where images have been taken. A user is able to select a cluster and  
6 proceed the images that are associated with the location of the selected  
7 cluster. As shown on the lower portion of Slide 14, Okamura describes that  
8 these clusters are displayed on the map as thumbnail images.

9 Moving to Slide 15, you can see the first theory or the combination  
10 of Okamura and Belitz at the upper left part of Slide 15, you have Figures  
11 4A and 4B of Belitz which show an interactive map that is similar to the  
12 interactive map of Okamura that we just discussed. As you can see on Slide  
13 15, on the Belitz interactive map, Belitz displays thumbnails of images taken  
14 at different locations on the map. The concept is very similar to Okamura,  
15 but instead of using thumbnails of clusters, as described in Okamura, Belitz  
16 uses thumbnails of images taken at the different locations. In the first theory  
17 of the combination, the Belitz image thumbnails are simply used to replace  
18 the Okamura cluster thumbnails on the Okamura interactive map. A simple  
19 substitution of one note thumbnail for another. Unless there are any  
20 questions on the first theory for our combination, I'd like to move to Slide  
21 16 to discuss the second theory.

22 JUDGE BROWNE: No. I think that we must have gotten an  
23 artifact from someone. I don't believe there are any questions.

24 MR. MONALDO: Okay. Thank you, Your Honors. As shown on  
25 Slide 16, there are our second theory for the combination. Instead of  
26 replacing Okamura's cluster thumbnails with Belitz's image thumbnails, the

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