

Samsung Electronics Co. LTD. (Petitioner)
v.
MemoryWeb, LLC (Patent Owner)
Petitioner Demonstratives

Case No. IPR2022-00222
U.S. Patent No. 10,621,228

Before Hon. Lynne H. Browne, Norman H. Beamer, and Kevin C. Troch

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Background / Overview	
Issue 1: Okamura-Belitz renders obvious “responsive to...” ([1g], [1i])	
Issue 2: Okamura-Belitz renders obvious “first/second name” ([1g], [1i], [1k])	
Issue 3: POSITA would have been motivated to combine Okamura and Belitz ([1c], [1d])	
Issue 4: Dependent claims 18-19 are rendered obvious	

Background / Overview

Overview of the '228 Patent

(12) **United States Patent**
Desmond et al. (10) **Patent No.:** **US 10,621,228 B2**
(45) **Date of Patent:** *Apr. 14, 2020

(54) **METHOD AND APPARATUS FOR MANAGING DIGITAL FILES**

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(72) Inventors: **Christopher J. Desmond**, Glen Ellyn, IL (US); **Nancy L. Desmond**, Glen Ellyn, IL (US); **L. Michael Taylor**, Chicago, IL (US)

(73) Assignee: **NCM IP Holdings, LLC**, Glen Ellyn, IL (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

This patent is subject to a terminal disclaimer.

(21) Appl. No.: **16,578,238**

(22) Filed: **Sep. 20, 2019**

(65) **Prior Publication Data**
US 20200026727 A1 Jan. 23, 2020

Related U.S. Application Data
(63) Continuation of application No. 16,536,300 filed on Aug. 8, 2019, which is a continuation of application (Continued)

(51) **Int. Cl.**
G06F 16/58 (2019.01); **G06F 16/67** (2019.01); **G06F 16/90** (2019.01)

(52) **U.S. Cl.**
G06F 16/586 (2019.01); **G06F 16/67** (2019.01); **G06F 16/90** (2019.01); **G06F 16/907** (2019.01); **G06F 3/0481** (2013.01)

(58) **Field of Classification Search**
CPC ... **G06F 16/5866**; **G06F 16/907**; **G06F 16/901**
See application file for complete search history.

(45) **Date of Patent:** *Apr. 14, 2020

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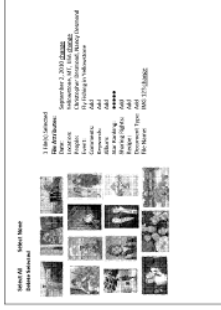
Kozanowitz et al., "Monitoring Annotation for Personal Digital Photo Libraries: Lowering Barriers while Raising Incentives," Tech Report BCL-2004-18, U. Maryland, 2005 (10 pages).

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(74) *Attorney, Agent, or Firm*—Nixon Peabody LLP

(57) **ABSTRACT**

A computer-implemented method of associating digital tags with digital files comprises storing a plurality of digital files having embedded therein content data and metadata including tags, receiving, via a user interface device of a client device, a user input, and associating the digital files with the user input based on the user input and a controller device; a selected first one of the tags of the metadata in a first of the digital files to include the first tag label; receiving, via the user interface device or another user interface device, a user input, and associating the digital files having at least the first tag label; responsive to receiving the instruction, automatically searching for all of the digital files having at least the first tag label; and displaying, on a video display device associated with the client device, a first indication of the first tag label.

19 Claims, 50 Drawing Sheets



Ex. 1001, Cover.

- U.S. Patent No. 10,621,228 (the “228 Patent” or “Ex. 1001”) has earliest possible priority claim to patent application 13/157,214 filed June 9, 2011.

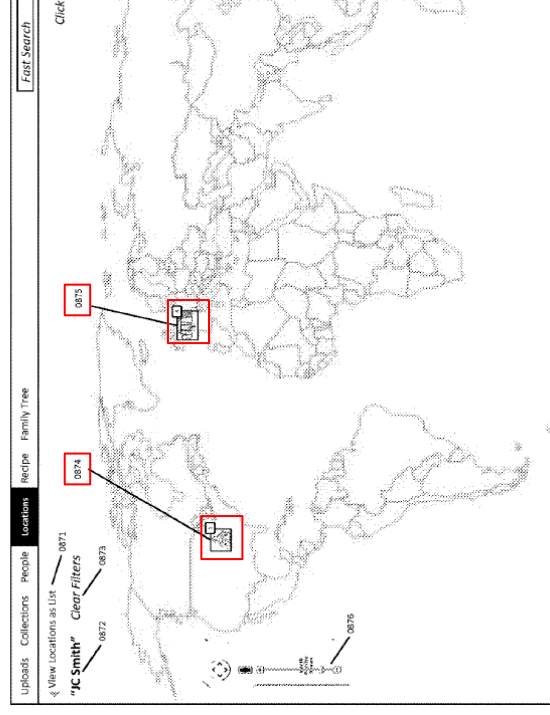
- Challenged Claims

- Independent claim 1
- Dependent claims 2-19

Ex. 1001, Cover; Petition

Overview of the '228 Patent

In FIG. 41, an illustration of the results for a Single Application Dot-Tag Filter in the Location Application View is depicted (0870). Within the Location Application View the Digital Files are displayed within an interactive map (Google map shown as an example). The Location View can also provide additional outputs such as a journey route that identifies the specific locations for an event or trip that can be customized by users. In this view, individual or groups of Digital Files are illustrated as photo thumbnails (see indicators 0874 and 0875) on the map and the user can select the thumbnail to see all the Digital Files with the same location (as seen FIG. 34 (indicator 1630)) or the user can use the interactive map and narrow the map view by either using the zoom in/zoom out bar (0876) on the left or simply selecting the map. Note that the pinned locations include a thumbnail of the Digital File (or Collection cover) and the number of Digital Files for that location.



Petition, 2; Ex. 1001, 29:41-64.

Petition, 3; Ex. 100

49. The '228 patent describes a map view (as illustrated in FIG. 41 below) that displays an interactive map and location selectable thumbnail images at different locations on the map. The location selectable thumbnail images (e.g., indicators 0874 and 0875) allow the user to select the thumbnail to see all the Digital Files with the same location." Ex. 1001, 29:51-52.

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