

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,  
Petitioner,

v.

MEMORYWEB, LLC,  
Patent Owner.

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

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**PETITION FOR *INTER PARTES* REVIEW**

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## 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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