

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. et al,
Petitioner,

v.

MEMORYWEB, LLC,
Patent Owner.

Case IPR2022-00222
Patent 10,621,228

PETITIONER'S UPDATED MANDATORY NOTICES

Under 37 CFR § 42.8, Petitioner submits the following updated mandatory notices out of an abundance of caution to address Patent Owner’s expansive view of what is required by the Board’s rule. Specifically, in preliminary responses filed in IPR2022-00221 and IPR2022-00222, Patent Owner raised concerns over the listing of related matters in Petitioner’s mandatory notices. Although Petitioner contends that its prior notice complied with USPTO rules, out of an abundance of caution, Petitioner notes that the ’228 patent is related to the following U.S. Patents: 9,098,531 (“the ’531 patent”); 9,552,376 (“the ’376 patent”); 10,423,658 (“the ’658 patent”); 11,017,020 (“the ’020 patent”); 11,163,823 (“the ’823 patent”); and 11,170,042 (“the ’042 patent”), and identifies the following matters involving these patents:

- *MemoryWeb, LLC v. Samsung Electronics Co., Ltd. et al.*, 6:21-cv-00411 (W.D. Tex.);
- *MemoryWeb, LLC v. Apple Inc.*, 6:21-cv-00531 (W.D. Tex.);
- *MyHeritage (USA), Inc. et. al. v. MemoryWeb, LLC*, 1:21-cv-02666 (N.D. Ill.);
- *Samsung Electronics Co., LTD. v. MemoryWeb LLC*, IPR2022-00221 (‘658 patent);
- *Samsung Electronics Co., LTD. v. MemoryWeb LLC*, IPR2022-00885 (’823 patent);

- *Samsung Electronics Co., LTD. v. MemoryWeb LLC*, PGR2022-00034 ('823 patent);
- *Apple Inc. v. MemoryWeb, LLC*, IPR2022-00111 ('020 patent);
- *Apple Inc. v. MemoryWeb, LLC*, PGR2022-00006 ('020 patent);
- *Apple Inc. v. MemoryWeb, LLC*, IPR2022-00033 ('658 patent);
- *Apple Inc. v. MemoryWeb, LLC*, IPR2022-00032 ('376 patent);
- *Apple Inc. v. MemoryWeb, LLC*, IPR2022-00031 ('228 patent);
- *Unified Patents, LLC v. MemoryWeb, LLC*, IPR2021-01413, ('228 patent); and
- U.S. Patent Application No. 17/459,933.

Respectfully submitted,

Date: May 25, 2022

/Jeremy J. Monaldo/
W. Karl Renner, Reg. No. 41,265
Jeremy J. Monaldo, Reg. No. 58,680
Hyun Jin In, Reg. No. 70,014
Fish & Richardson P.C.
3200 RBC Plaza, 60 South Sixth Street
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

