

U.S. Patent No. 10,621,228  
Patent Owner's Unopposed Request for  
Entry of Corrected Patent Owner's Response  
IPR2022-00222

Paper No. \_\_\_\_\_

**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. et al,  
Petitioner

v.

MEMORYWEB, LLC  
Patent Owner

Patent No. 10,621,228

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*Inter Partes* Review No. IPR2022-00222

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**UNOPPOSED REQUEST FOR ENTRY OF CORRECTED PATENT  
OWNER'S RESPONSE**

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Exhibit No.	Description
2001	Withdrawn
2002	Japanese Unexamined Patent Application Publication No. 2001-160058 and Certified English Translation (“Fujiwara”)
2003	Withdrawn
2004	U.S. Patent No. 6,714,215 (“Flora”)
2005	Supplemental Declaration of Kevin Jakel, <i>Unified Patents, LLC v. MemoryWeb, LLC</i> , IPR2021-01413 (Dec. 30, 2021) (redacted version)
2006	3 Questions for Unified Patents CEO Post-Oil States (Part II)
2007	Petition for <i>Inter Partes</i> Review, <i>Apple Inc. v. MemoryWeb, LLC</i> , IPR2022-00031, Paper 1 (PTAB Oct. 30, 2021)
2008	Brief of Amicus Curiae Unified Patents Inc. in <i>Cuozzo Speed Technologies, LLC v. Michelle K. Lee et al.</i>
2009	Unified Patents September 3, 2021 Press Release regarding MemoryWeb IPR
2010	Unified Patents September 9, 2021 email regarding MemoryWeb IPR
2011	Unified Patent's website link (FAQs) ( <a href="https://www.unifiedpatents.com/faq">https://www.unifiedpatents.com/faq</a> )
2012	Case Readiness Status Report, <i>MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 21-cv-411 (W.D. Tex.) (Sept. 3, 2021)
2013	Amended Complaint, <i>MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 21-cv-

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Exhibit No.	Description
	411 (W.D. Tex.) (Nov. 24, 2021)
2014	Excerpts from Defendant Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc.'s Initial Invalidation Contentions, <i>MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 21-cv-411 (W.D. Tex.) (Jan. 31, 2022)
2015	Joint Motion for Entry of Agreed Scheduling Order, <i>MemoryWeb, LLC v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.</i> , Case No. 21-cv-411 (W.D. Tex.) (Oct. 1, 2021)
2016	<i>MV3 Partners LLC v. Roku Inc.</i> , 6:18-cv-00308, (W.D. Texas) D.I. 83
2017	IAM, "The last thing anyone should think about WDTX is that it is patent plaintiff friendly, says Albright" (Apr. 7, 2020)
2018	Pages from The Way Back Machine The Wayback Machine- <a href="https://web.archive.org/web/20000510141416/http://www.photo.net:80">https://web.archive.org/web/20000510141416/http://www.photo.net:80</a>
2019	Cluster Map, Thumbnail, First Combination Comparison
2020	Japanese Unexamined Patent Application Publication No. 2007-323544 and Certified English Translation ("Takakura")
2021	Patent Owner Response, <i>Unified Patents, LLC v. MemoryWeb, LLC</i> , IPR2021-01413, Paper 30 (Redacted Version)
2022	Transcript of the deposition of Dr. Philip Greenspun dated August 26, 2022
2023	Declaration of Professor Glenn Reinman, Ph.D

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Exhibit No.	Description
2024	Corrected Patent Owner's Response

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Patent Owner, MemoryWeb, LLC, respectfully requests entry of the Corrected Patent Owner Response, filed herewith at Exhibit 2024. The Board authorized filing of this request on November 3, 2022.

The Patent Owner Response (Paper 19) inadvertently referenced the wrong exhibit number when citing a deposition transcript in three places (“EX2002” vs. “EX2022”). *See* POR pages 32, 39, 59. The Corrected Patent Owner Response corrects those three errors. No other changes have been made. Petitioner, Samsung, does not oppose this request.

The undersigned attorney welcomes a telephone call should the Board have any requests or questions.

For the foregoing reasons, Patent Owner respectfully requests entry of the Corrected Patent Owner Response.

Respectfully Submitted,

November 7, 2022

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