

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MemoryWeb, LLC,

Plaintiff

v.

Samsung Electronics Co., Ltd. (a Korean
Company) and Samsung Electronics America,
Inc.,

Defendants

Case No. 21-cv-411-ADA

**PLAINTIFF MEMORYWEB, LLC'S FIRST SUPPLEMENTAL INITIAL
INFRINGEMENT CONTENTIONS**

Pursuant to the Case Readiness Status Report (Doc. 21) and the Agreed Scheduling Order (Doc. 35), Plaintiff MemoryWeb, LLC (“MemoryWeb”) hereby submits the following initial infringement contentions with respect to Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”) with respect to U.S. Patent No. 10,423,658 (“the ‘658 patent”), U.S. Patent No. 10,621,228 (“the ‘228 patent”), and U.S. Patent No. 11,163,823 (“the ‘823 patent”) (collectively, “the Asserted Patents”).

MemoryWeb’s investigation is ongoing and the contentions set forth herein are based on the information available to MemoryWeb as of the date of these contentions. MemoryWeb reserves the right to supplement or amend this disclosure after receiving discovery from Samsung, or other third parties, particularly documents and other discovery regarding Samsung’s accused products (e.g., source code) and as additional information becomes available.

I. Identification of the Asserted Claims

Samsung has infringed and continues to infringe at least the following claims of the '658 patent: claims 1-15. Samsung has infringed and continues to infringe at least the following claims of the '228 patent: claims 1-10 and 12-15, and 17-19. Samsung has infringed and continues to infringe at least the following claims of the '823 patent: claims 1-34. MemoryWeb's investigation is ongoing and discovery has not commenced. Accordingly, this identification of asserted claims is based on information available to MemoryWeb at this time. MemoryWeb reserves the right to add, delete, substitute, or otherwise amend this list of asserted claims should discovery, the Court's claim construction, or other circumstances so merit.

II. Identification Priority Dates

The priority date for claims 1-15 of the '658 patent and claims 1-10 and 12-15, and 17-19 of the '228 patent is February 28, 2014. The priority date for claims 1-34 of the '823 patent is June 9, 2011. MemoryWeb reserves the right to update or amend this identification of priority dates should the Court's claim construction or other circumstances so merit.

III. Identification of Accused Products

On information and belief, MemoryWeb identifies the following accused products: Samsung has and continues to make, use, sell, offer for sale, and/or import products and services, including without limitation those marketed by Samsung as Samsung Gallery (hereinafter, "the Gallery Application"). On information and belief, at least the following Samsung products include and/or use the Gallery Application: Samsung Galaxy smartphones (including, but not limited to, A series, S series, Z series, and Note models) and Samsung Galaxy tablets (including, but not limited to, Tab A and Note models). On information and belief, additional Samsung products are compatible with and use the Gallery Application.

The Gallery Application and the Samsung products described above that include and/or use the Galley Application software are collectively referred to herein as the “Accused Samsung Products.” MemoryWeb reserves the right to amend this identification of accused products, as well as other information contained herein, to incorporate new information as in becomes available under the course of discovery.

IV. Claim Charts

Claim charts identifying a location of each and every element of every asserted claim of the Asserted Patents in the Accused Samsung Products are attached hereto as Exhibits A-C. Exhibits A and B illustrate Samsung’s infringement using Gallery version 12.1.04.6. MemoryWeb contends that there are no material differences between Gallery version 12.1.04.6 and additional Gallery versions for purposes of infringement, including at least one or more versions released at least as early as Gallery version 11.5 (*see* Complaint at ¶¶ 47-56). Exhibit C illustrates Samsung’s infringement using Gallery version 12.1.09.0. MemoryWeb reserves the right to amend these charts, as well as other information contained in these disclosures and contentions, to incorporate new information learned during the course of discovery and to identify additional specific versions of the Gallery Application. MemoryWeb also reserves the right to amend its claim charts, as well as other information contained in these disclosures and contentions, upon the Court’s issuance of a claim construction order.

V. Literal Infringement and Doctrine of Equivalents

Under the proper construction of the asserted claims, the limitations of each asserted claim in the Asserted Patents are satisfied literally in the Accused Samsung Products. However, to the extent that any claim limitation or element is found not be literally embodied or practiced by the Accused Samsung Products, MemoryWeb contends that the Accused Samsung Products embody

or practice such claim limitations or elements under the doctrine of equivalents because there are no substantial differences, and the Accused Samsung Products perform substantially the same function, in substantially the same way, to achieve substantially the same result.

VI. Direct Infringement

Samsung (including Samsung's employees) and Samsung's customers (including end users of the products described above) using the Accused Samsung Products have directly infringed, and continue to directly infringe, the Asserted Claims as set forth in the attached claim charts. This infringement has occurred, either literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States without authority, the Accused Products.

To the extent Samsung contends that it or the Accused Samsung Products do not perform each and every step of the Asserted Claims, Samsung directs or controls the performance by others of each claim limitation that it does not perform itself, such that the performance of each claim limitation can be attributed to Samsung.

VII. Induced and Contributory Infringement

Samsung has induced and continues to induce infringement of the Asserted Claims literally or under the doctrine of equivalents by making, selling, offering to sell, and/or importing the Accused Products to or for its customers (including end users), and providing such customers (including end users) with instructions and training on how to use the Accused Products in a manner that directly infringes the claims, all while Samsung has knowledge of the Asserted Patents and Asserted Claims, and knowledge that such use of the Accused Products would infringe the Asserted Claims. Samsung acts with knowledge and specific intent to encourage and facilitate such infringing acts by its customers. Samsung's technical and marketing documentation for the

Accused Samsung Products provides specific instruction for using, and actively encourages its customers to use, the Accused Samsung Products in an infringing manner.

Samsung has and continues to contributorily infringe the Asserted Claims by using, offering to sell, selling, or importing the Accused Products. The Accused Products in operation form a component of a machine, manufacture, combination, or composition, constituting a material part of the invention for each of the Asserted Patents. Samsung knows that the Accused Products are especially made or adapted for use in an infringement of the Asserted Claims, and that the Accused Products are not a staple article or other system capable of substantial non-infringing use.

Dated: November 24, 2021

Respectfully submitted,

/s/ Daniel J. Schwartz

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CERTIFICATE OF SERVICE

I, Daniel J. Schwartz, an attorney of record in this matter, hereby certify that on November 24, 2021, I caused the following document:

Plaintiff MemoryWeb LLC's First Supplemental Initial Infringement Contentions

to be served on the following counsel of record via electronic service:

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Exhibit A

U.S. Patent No. 10,423,658 – Infringement Claim Chart

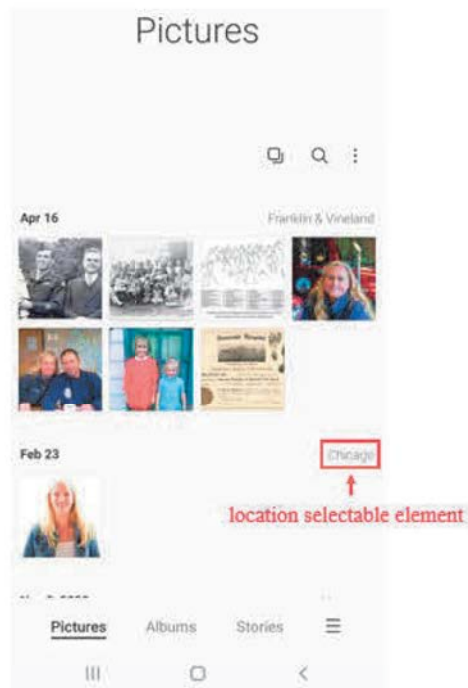
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,423,658 (“the ‘658 patent”) in the Samsung Gallery application (“Gallery”). The exemplary screenshots below were taken using a Samsung Galaxy A51 running Gallery Version 12.1.04.6. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

| CLAIM ELEMENT | SAMSUNG’S INFRINGEMENT |
|---|--|
| <p>I[pre] A computer-implemented method of displaying at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken, the method comprising:</p> | <p>To the extent the preamble is limiting, Gallery displays at least a portion of a plurality of (i) digital photographs, (ii) videos, or (iii) a combination of (i) and (ii), each of the digital photographs and videos being associated with a geotag indicative of geographic coordinates where the respective digital photograph or video was taken. <i>See infra.</i></p>  <p>The screenshot shows the 'Pictures' view in the Samsung Gallery app. At the top, the word 'Pictures' is centered. Below it are icons for share, search, and a menu. The main area displays a grid of photos. The first section is dated 'Apr 16' and is geotagged 'Franklin & Vineland', showing several photos of people and buildings. The second section is dated 'Feb 23' and is geotagged 'Chicago', showing a photo of a person. At the bottom, there are navigation options for 'Pictures', 'Albums', and 'Stories', along with a hamburger menu icon.</p> |

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1[a] displaying an application view on a video display device including displaying a plurality of selectable elements, the plurality of selectable elements including a location selectable element;

Gallery displays an application view on a video display device (e.g., a Samsung device such as a smartphone or tablet) including a plurality of selectable elements, which include a location selectable element. A first example of a location selectable element in an application view including a plurality of selectable elements is shown below.

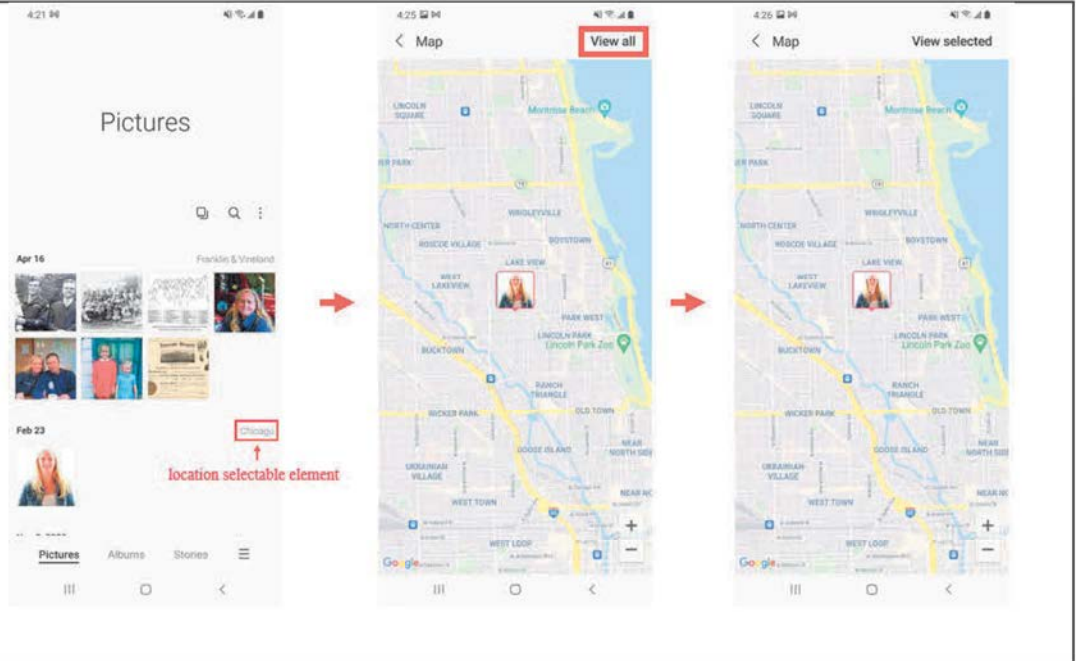


Another example of a location selectable element in an application view is shown below.

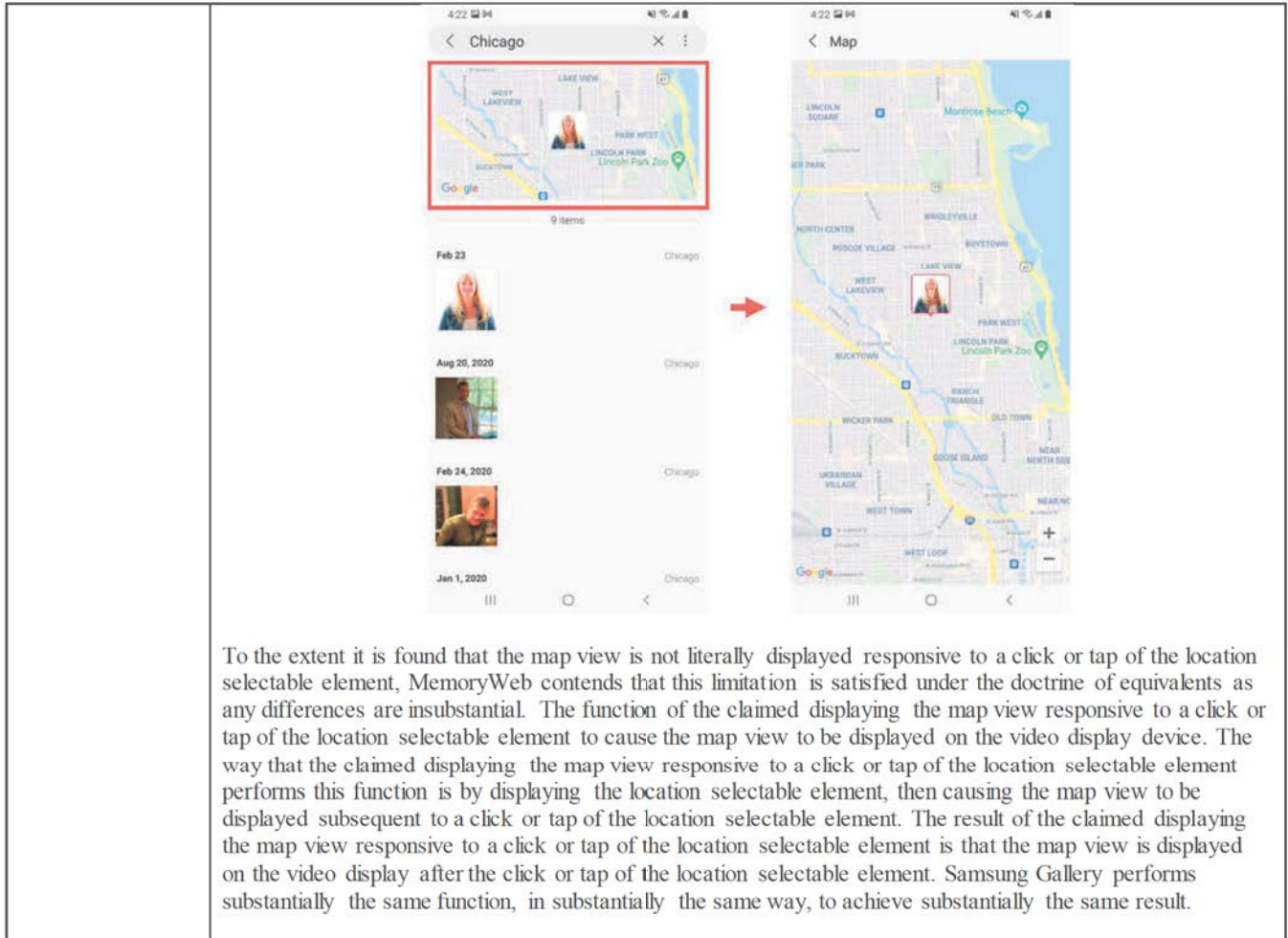
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| | <p>The image shows two screenshots from a Samsung Gallery application. The left screenshot displays a search for "Portraits" with a "Locations" section. The "Chicago" location thumbnail is highlighted with a red box, and a red arrow points from this box to a red box around a map view of Chicago in the right screenshot. Another red arrow points from the "Chicago" thumbnail to a gallery view of photos taken in Chicago.</p> |
| <p>1(b) responsive to a click or tap of the location selectable element, displaying a map view on a video</p> | <p>Gallery displays a map view on a video display device (e.g., a Samsung smartphone or tablet) responsive to a click or tap of the location selectable element.</p> |

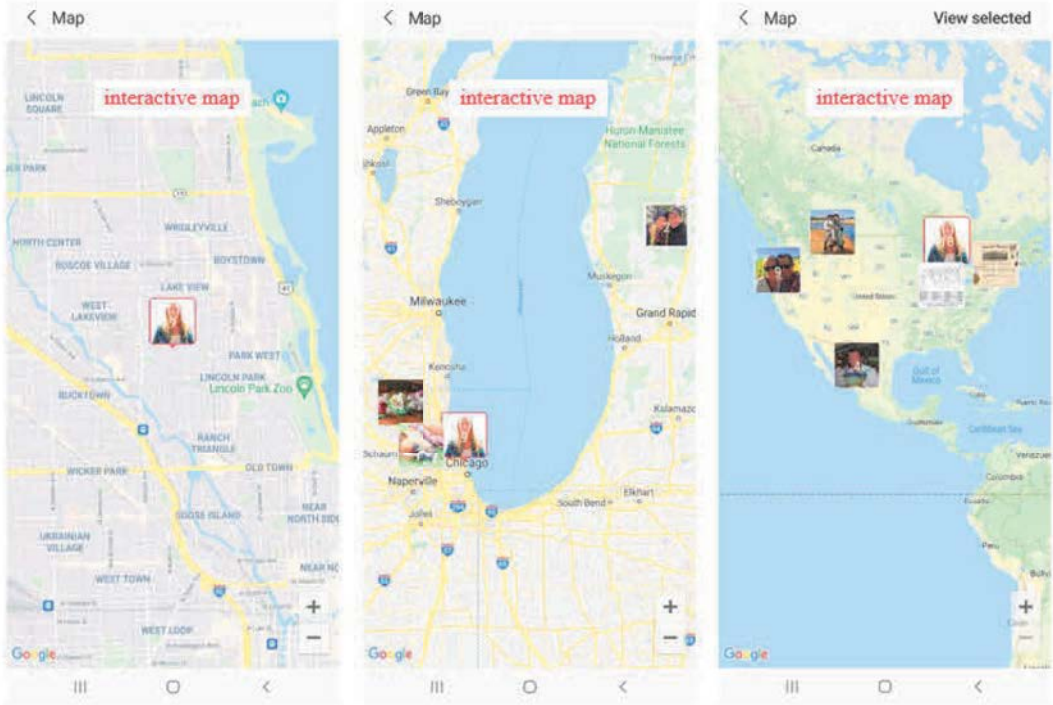
Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Samsung Gallery

display device, the displaying the map view including displaying:

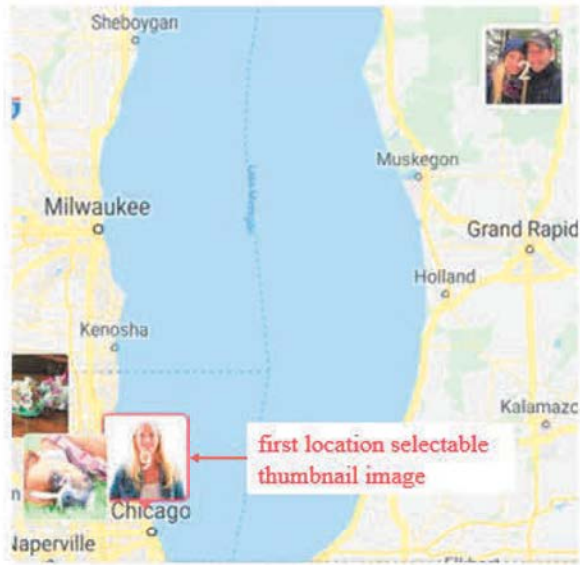


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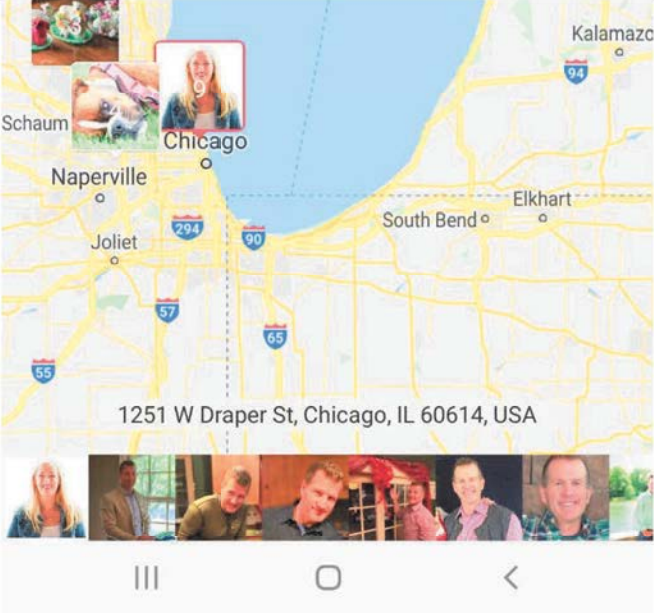
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| <p>1[b][i] (i) a representation of an interactive map;</p> | <p>As shown above, displaying the map view includes displaying a representation of an interactive map. The map is interactive, at least because Gallery zooms in or out on the map, as shown below.</p>  |
| <p>1[b][ii] (ii) a first location selectable thumbnail image at a first location on the interactive map, the first</p> | <p>Displaying the map view includes displaying a first location selectable thumbnail image at a first location on the interactive map.</p> |


location being associated with the geographic coordinates of a first geotag,



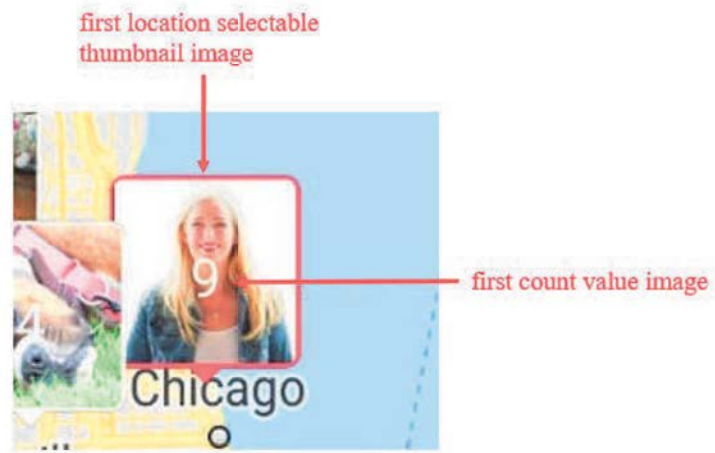
The first location is associated with the geographic coordinates of a first geotag. In this example, the first location selection thumbnail is associated with Chicago, IL.

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| <p>1[b][ii][A] a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag;</p> | <p>The first location selectable thumbnail image is associated with a first set of digital photographs and videos including all of the digital photographs and videos associated with the first geotag.</p> |

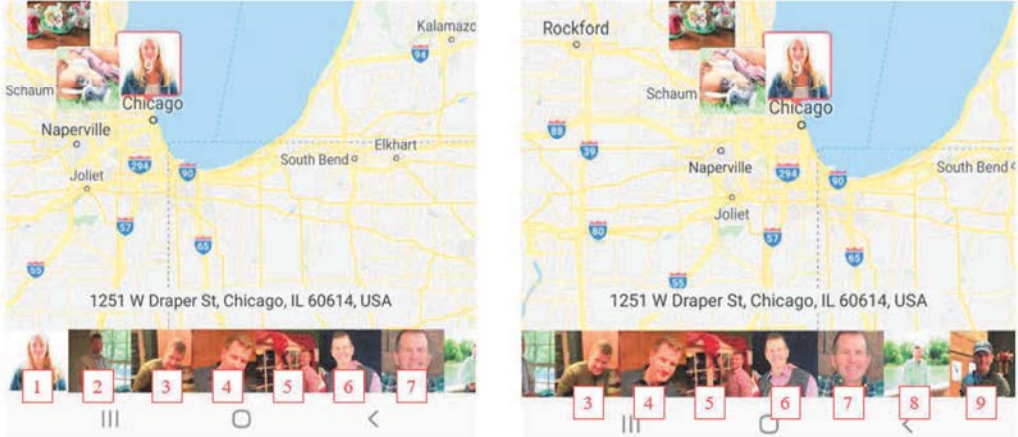
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| |  <p>scaled replicas from first set of digital photographs and videos</p> |
| <p>1[b][iii] (iii) a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number that corresponds to the number of digital</p> | <p>Displaying the map view includes displaying a first count value image partially overlapping the first location selectable thumbnail image, the first count value image including a first number.</p> |

photographs and videos in the first set of digital photographs and videos;

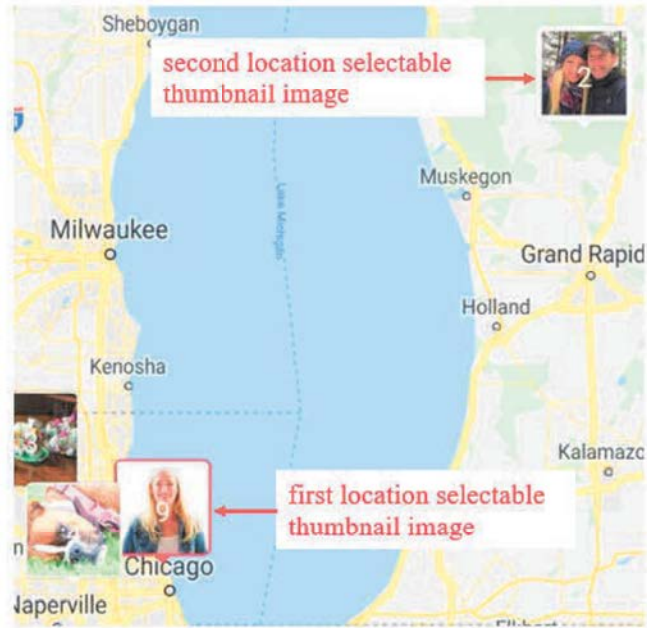


The first count value (in this example, 9) corresponds to the number of digital photographs and videos in the first set of digital photographs and videos.

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| |  <p>To the extent it is found that the first count value image does not literally partially overlap the first location selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed partially overlapping is to indicate the number of digital photographs and videos in the first set of digital photographs and videos that are associated with the first location. The way the claimed partially overlapping performs this function is by positioning the first count value image in sufficient proximity to the first thumbnail image to create an association between the first thumbnail image and the first count value image, but without completely obscuring the first thumbnail image. The result of the claimed partially overlapping is that the first count value indicates the number digital photographs and videos in the first set of digital photographs and videos that are associated with the first location and the first thumbnail image without completely obscuring the first thumbnail image. Samsung Gallery performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p> |
| <p>1[b][iv] (iv) a second location selectable thumbnail image at a second</p> | <p>Displaying the map view also includes displaying a second location selectable thumbnail image at a second location on the interactive map.</p> |

location on the interactive map, the second location being associated with the geographic coordinates of a second geotag.

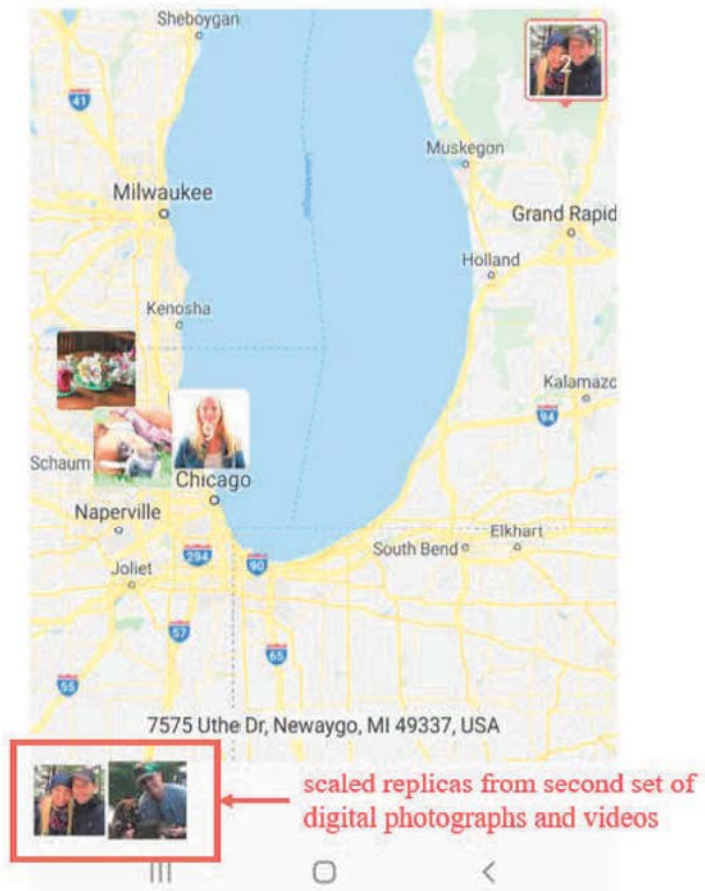


The second location is associated with the geographic coordinates of a second geotag. See information for 1[b][iv][A].

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| <p>1[b][iv][A] a second set of digital photographs and videos including</p> | <p>The second location selectable thumbnail image is associated with a second set of digital photographs and videos including all of the digital photographs and videos associated with the second geotag.</p> |

all of the digital photographs and videos associated with the second geotag; and



1[b][v] (v) a second count value

Displaying the map view includes displaying a second count value image partially overlapping the second location selectable thumbnail image.

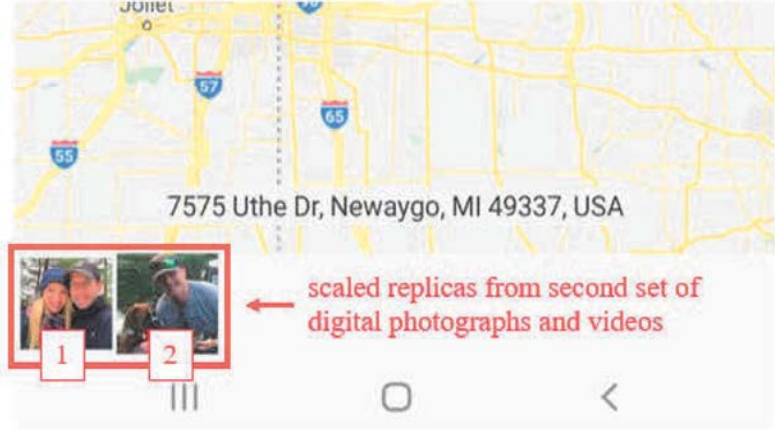
image partially overlapping the second location selectable thumbnail image, the second count value image including a second number that corresponds to the number of digital photographs and videos in the second set of digital photographs and videos;

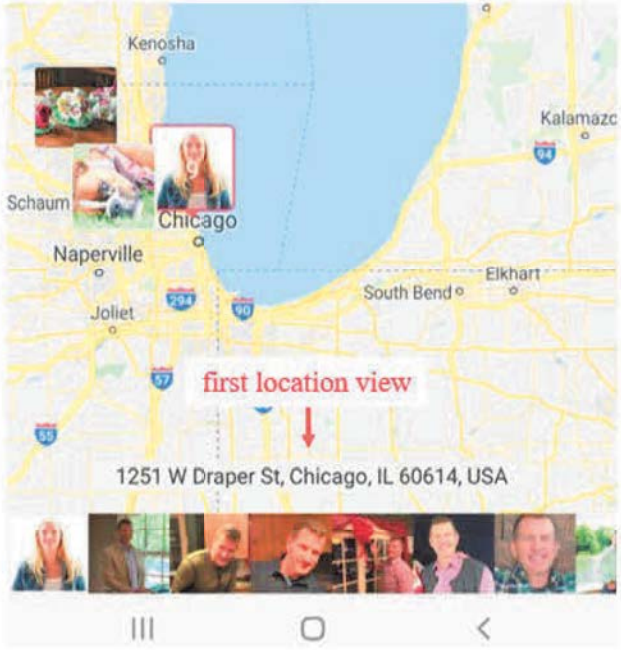
second location selectable thumbnail image

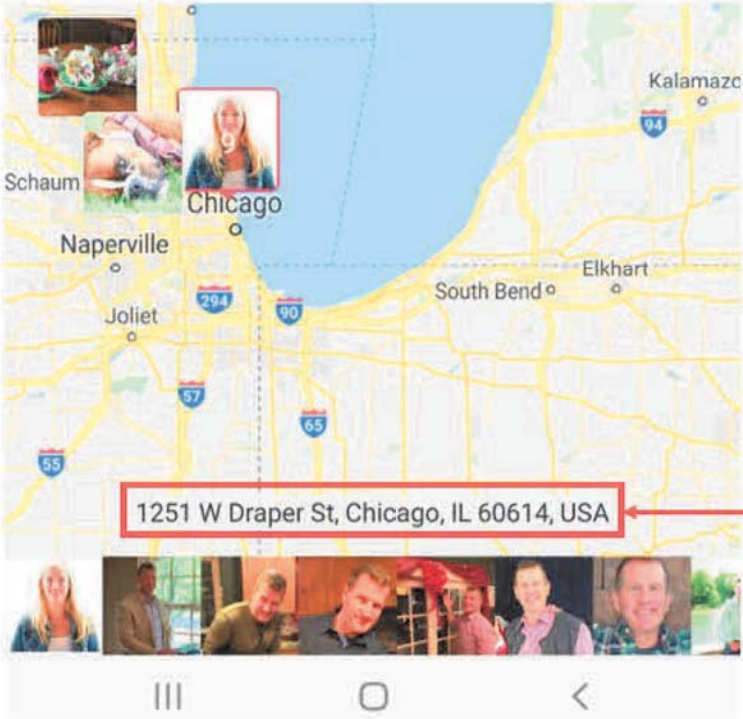


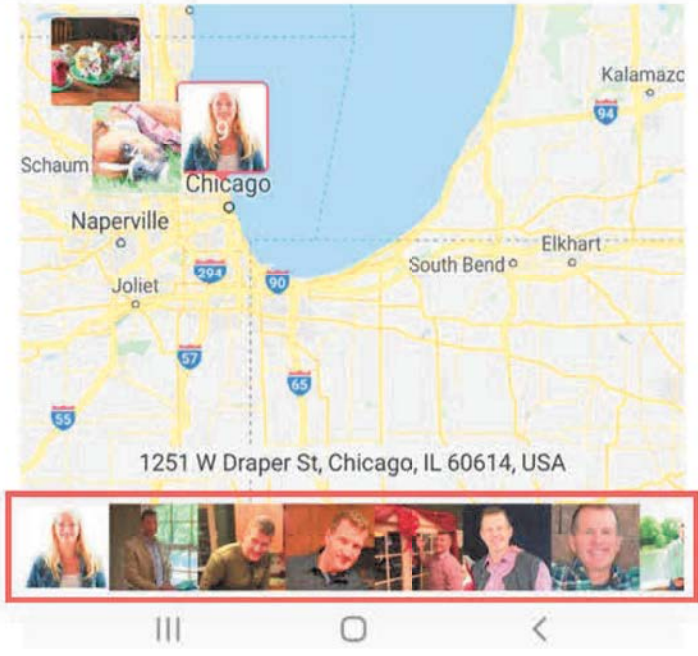
second count value image

The second count value image includes a second number corresponding to the number of digital photographs and videos in the second set of digital photographs and videos.

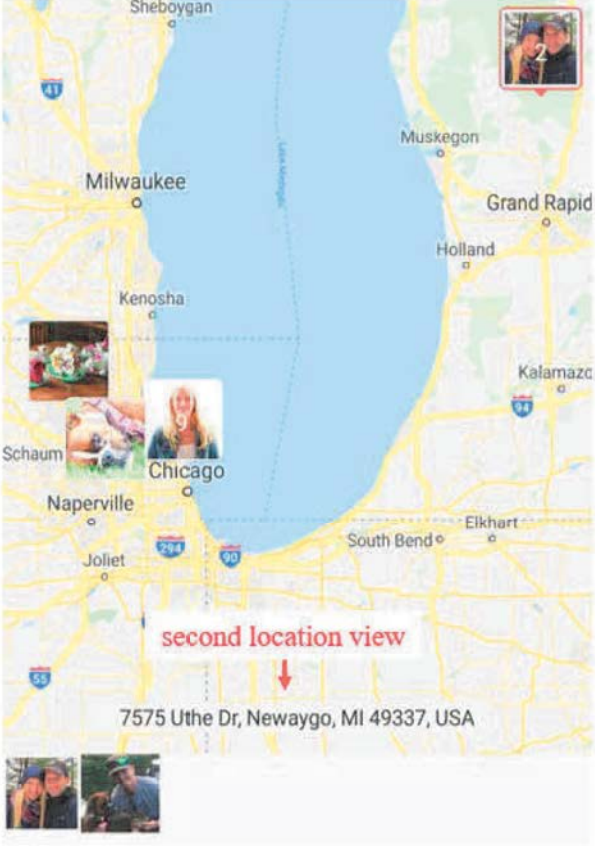
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| |  <p>To the extent it is found that the second count value image does not literally partially overlap the second location selectable thumbnail image, MemoryWeb contends that this limitation is satisfied under the doctrine of equivalents as any differences are insubstantial. The function of the claimed partially overlapping is to indicate the number of digital photographs and videos in the second set of digital photographs and videos that are associated with the second location. The way the claimed partially overlapping performs this function is by positioning the second count value image in sufficient proximity to the second thumbnail image to create an association between the second thumbnail image and the second count value image, but without completely obscuring the second thumbnail image. The result of the claimed partially overlapping is that the second count value indicates the number digital photographs and videos in the second set of digital photographs and videos that are associated with the second location and the second thumbnail image without completely obscuring the second thumbnail image. Samsung Gallery performs substantially the same function, in substantially the same way, to achieve substantially the same result.</p> |
| <p>1[c] responsive to a click or tap of the first location selectable thumbnail image,</p> | <p>Gallery displays a first location view on the video display device (e.g., a Samsung device) responsive to a click or tap of the first location selectable thumbnail image.</p> |

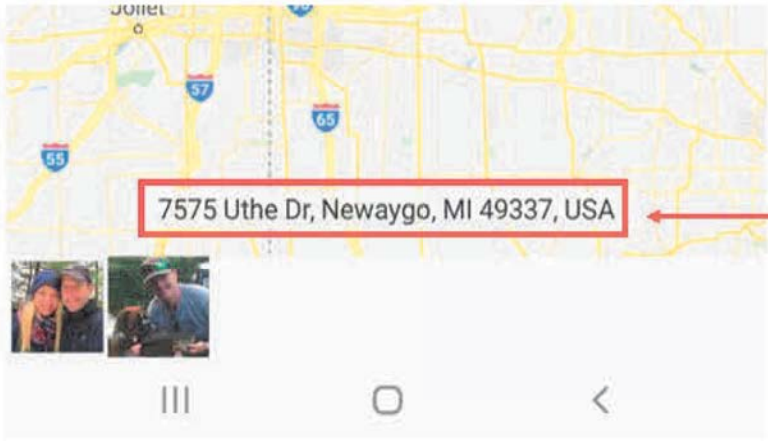
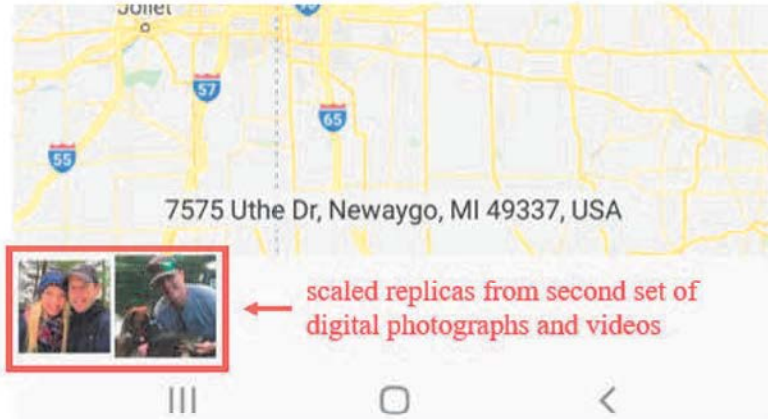
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| <p>displaying a first location view on the video display device, the displaying the first location view including displaying</p> |  |
| <p>1[c][i] (i) a first location name associated with the first geotag and</p> | <p>The first location view includes a first location name associated with the first geotag.</p> |

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| <p>1(c)(iii) ii) a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos, the</p> | <p>The first location view includes a scaled replica of each of the digital photographs and videos in the first set of digital photographs and videos.</p> |

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| <p>displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos not being overlaid on the interactive map; and</p> |  <p>The displayed scaled replicas of each of the digital photographs and videos in the first set of digital photographs and videos are not overlaid on the interactive map. <i>See</i> limitation 1[b][i].</p> |
| <p>1[d] responsive to a click or tap of the second location selectable thumbnail image, displaying a second location view on the video</p> | <p>, Gallery displays a second location view on the video display device (e.g., a Samsung device) responsive to a click or tap of the second location selectable thumbnail image.</p> |

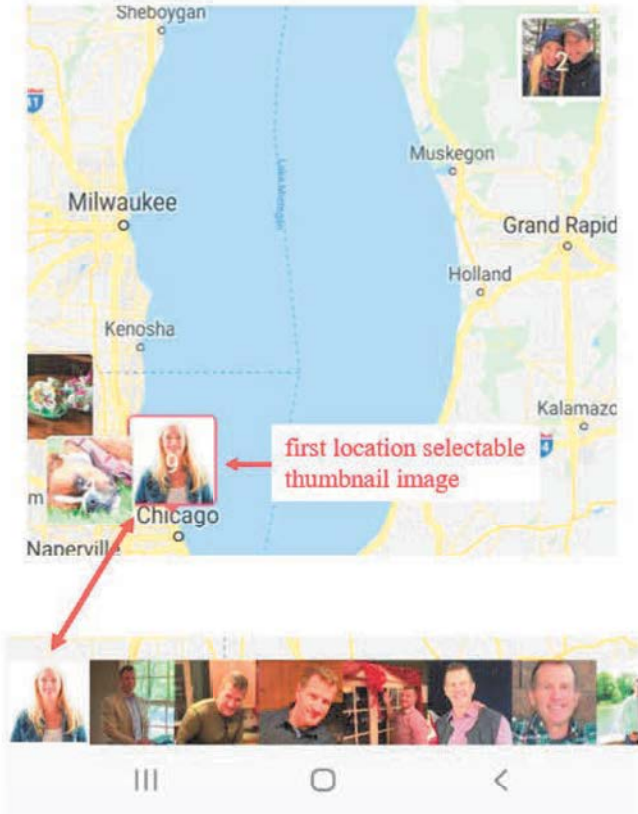
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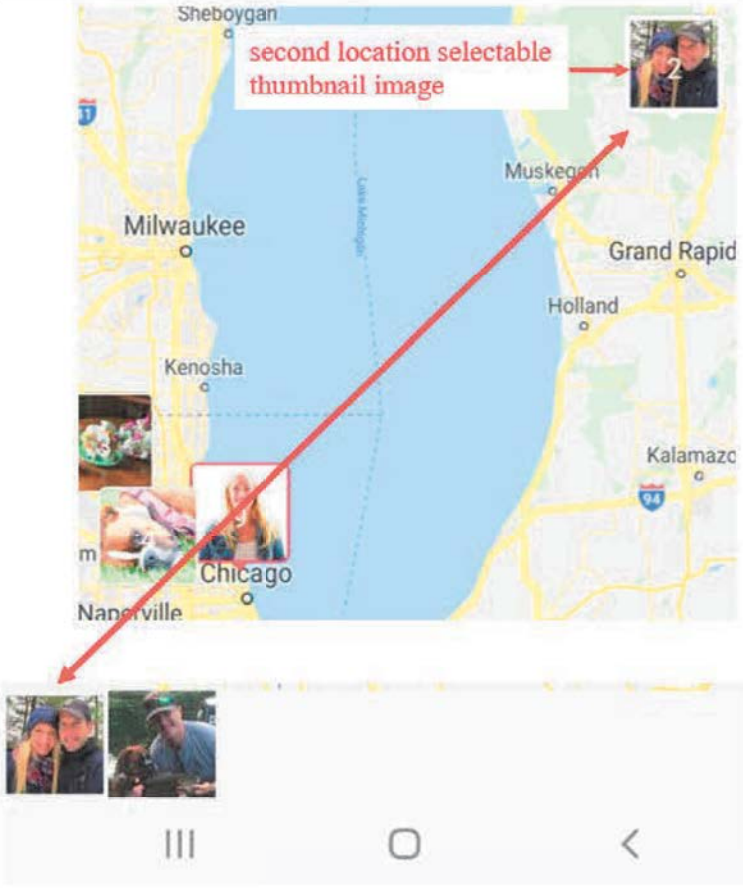
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| <p>display device, the displaying the second location view including displaying</p> |  |
| <p>1[d][i] (i) a second location name corresponding to</p> | <p>The second location view includes a second location name corresponding to the second geotag.</p> |

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| <p>the second geotag and</p> |  |
| <p>1 [d] [iii] (ii) a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos not being</p> | <p>The second location view also includes a scaled replica of each of the digital photographs and videos in the second set of digital photographs and videos.</p>  |

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| <p>overlaid on the interactive map.</p> | <p>As shown above, the displayed scaled replicas of each of the digital photographs and videos in the second set of digital photographs and videos are not overlaid on the interactive map; instead, they are displayed below the interactive map. <i>See also</i> information for limitation 1[b][i].</p> |
| <p>2[pre] The computer-implemented method of claim 1, wherein</p> | <p><i>See</i> information for claim 1.</p> |
| <p>2[a] the first location selectable thumbnail image includes a scaled representation of at least one of the digital photographs in the first set of digital photographs, and</p> | <p>As shown below, the first location selectable thumbnail image (<i>see</i> limitation 1[b][ii]) includes a scaled representation of at least one of the digital photographs in the first set of digital photographs (<i>see</i> limitation 1[b][ii][A]).</p> |

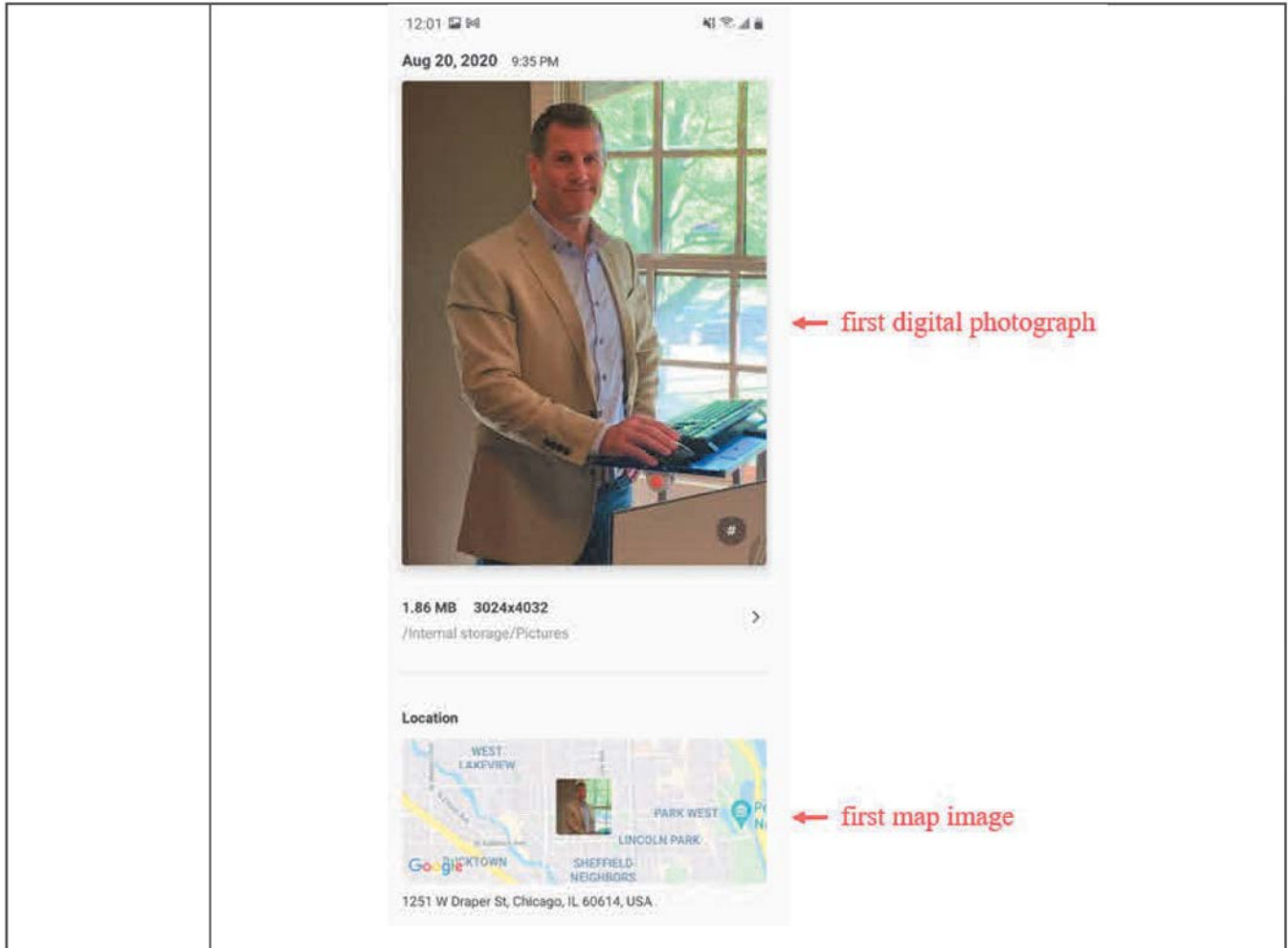
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| <p>2[b] and wherein the second location selectable thumbnail image</p> | <p>The second location selectable thumbnail image (<i>see</i> limitation 1[b][iv]) includes a scaled representation of at least one of the digital photographs in the second set of digital photographs (<i>see</i> limitation 1[b][iv][A]).</p> |

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| <p>includes a scaled representation of at least one of the digital photographs in the second set of digital photographs.</p> |  |
| <p>3[pre] The computer-</p> | <p>See information for claim 1.</p> |

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| <p>implemented method of claim 1, further comprising</p> | |
| <p>3[a] responsive to a click or tap of a first one of the displayed scaled replicas in the first location view, displaying a first digital photograph associated with the first scaled replica in the first location view and 3[b] a first map image indicating the geographic coordinates of the first geotag</p> | <p>Responsive to clicking one of the scaled replicas in the first location view (<i>see</i> limitation 1[c][ii]), a first digital photograph associated with the first scaled replica and a first map image indicating the geographic coordinates of the first geotag are displayed.</p> |

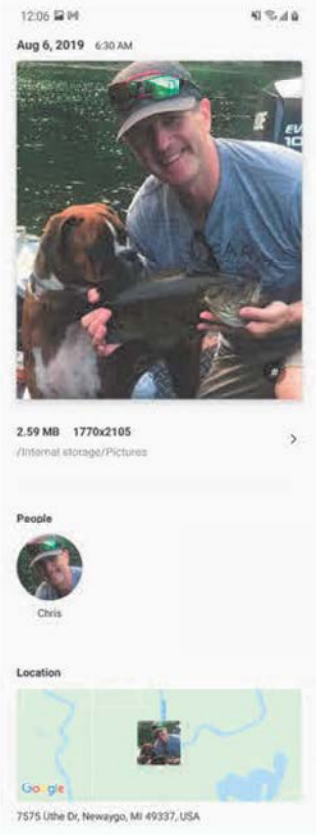
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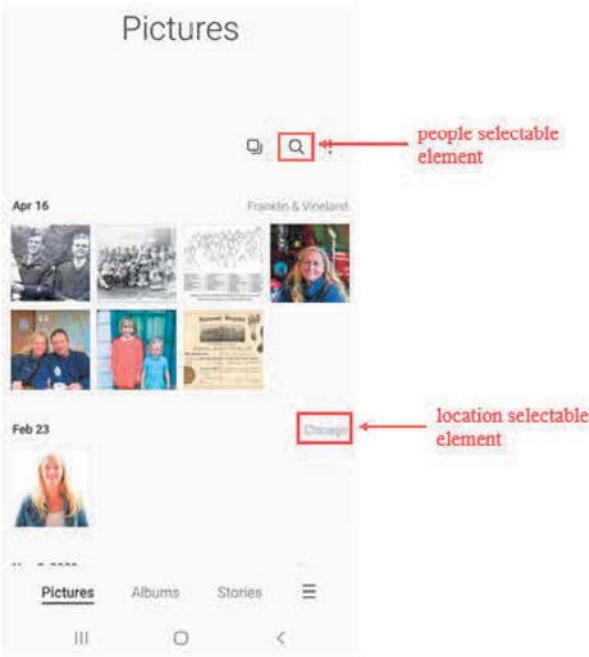


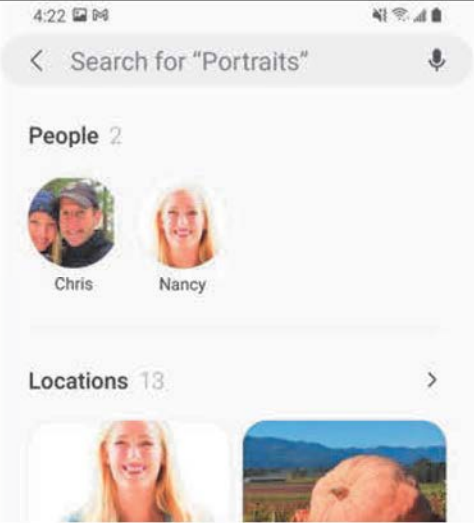
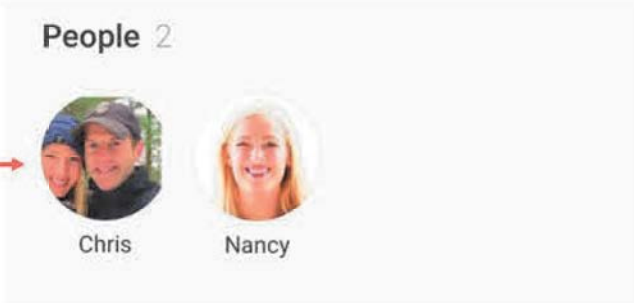
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| 4[pre] The computer-implemented method of claim 3, further comprising | <i>See information for claim 1.</i> |
| 4[a] responsive to a click or tap of a first one of the displayed scaled replicas in the second location view, displaying a first digital photograph associated with the first scaled replica in the second location view and 4[b] a second map image indicating the geographic coordinates of the second geotag. | Responsive to clicking one of the scaled replicas in the second location view, a second digital photograph associated with the second scaled replica and a second map image indicating the geographic coordinates of the second geotag are displayed. |

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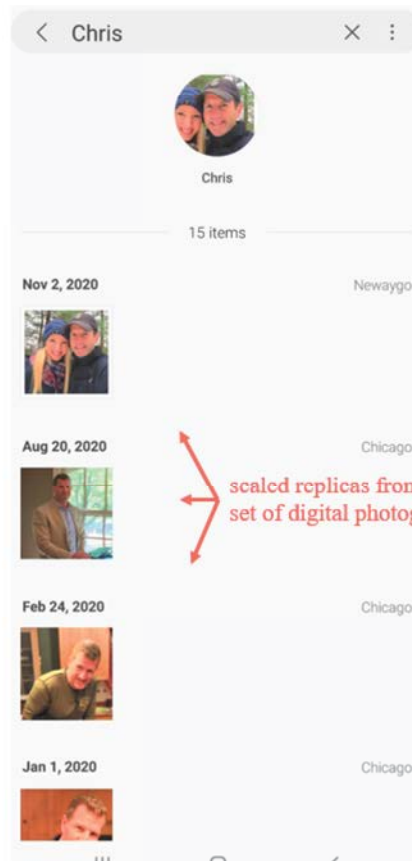
| | |
|------------------------------------|--|
| |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:06 and the date is Aug 6, 2019, 6:30 AM. The main image is a photograph of a man wearing a cap and sunglasses, smiling and holding a large fish. A dog is visible next to him. Below the photo, the file size is 2.59 MB and resolution is 1770x2105. The photo is stored in /Internal storage/Pictures. Below the photo, there is a 'People' section with a profile picture of 'Chris'. Below that is a 'Location' section showing a map with a small photo thumbnail overlaid on it. The location is identified as 7575 Lithé Dr, Newaygo, MI 49337, USA. A red arrow points to the photo with the text 'second digital photograph'. Another red arrow points to the map thumbnail with the text 'second map image'.</p> |
| <p>5[pre] The computer-</p> | <p>See information for claim 1.</p> |


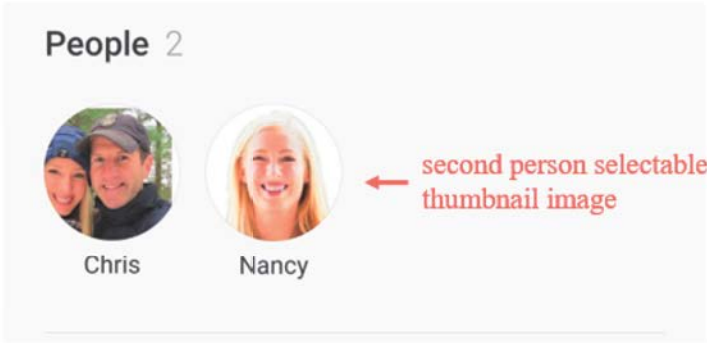
| | |
|---|---|
| <p>implemented method of claim 1,</p> <p>5[a] wherein the plurality of selectable elements further includes a people selectable element,</p> | <p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) includes a people selectable element, as shown below.</p>  <p>The screenshot shows a mobile gallery interface titled "Pictures". At the top right, there is a search icon (magnifying glass) inside a red box, with a red arrow pointing to it and the text "people selectable element". Below the search icon, there are several photo thumbnails. One thumbnail is labeled "Apr 16" and another "Franklin & Vineland". At the bottom of the screen, there is a navigation bar with "Pictures", "Albums", and "Stories" tabs. A red box highlights the word "Chicago" on the screen, with a red arrow pointing to it and the text "location selectable element".</p> |
| <p>5[b] the method further comprising responsive to a click or tap of the people selectable</p> | <p>Gallery displays a people view responsive to a click or tap of the people selectable element.</p> |

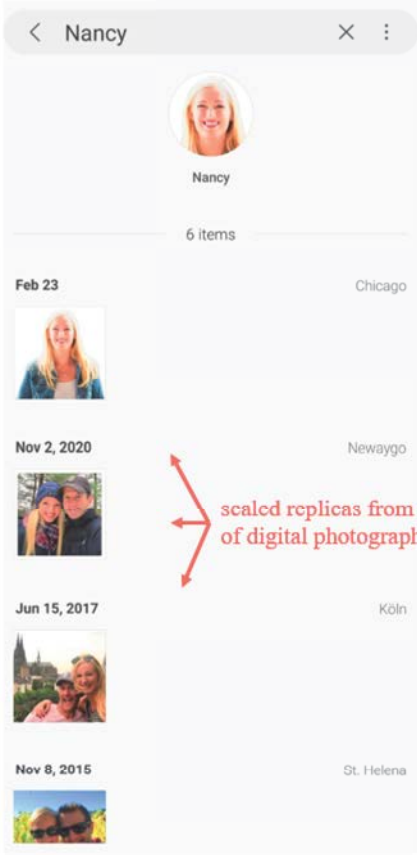
| | |
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| <p>element, displaying a people view, the displaying the people view including displaying:</p> |  <p>A screenshot of a mobile gallery application search results page. At the top, the search bar contains the text "Search for 'Portraits'". Below the search bar, there are two sections: "People 2" and "Locations 13". The "People 2" section displays two circular thumbnail images of people's faces, labeled "Chris" and "Nancy". A red arrow points from the text "people view" to the "People 2" section.</p> |
| <p>5[c] (i) a first person selectable thumbnail image including an image of a face of a first person, a third set of digital photographs and videos including digital photographs and videos associated with the first person;</p> | <p>The people view includes a first person selectable thumbnail image including an image of a face of a first person:</p>  <p>A close-up view of the "People 2" section from the screenshot above. A red arrow points from the text "first person selectable thumbnail image" to the circular thumbnail image of "Chris".</p> |

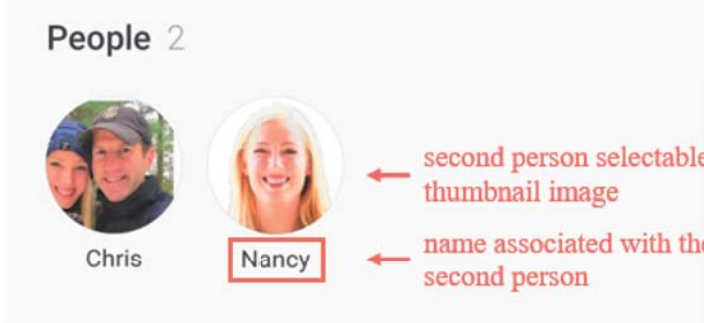
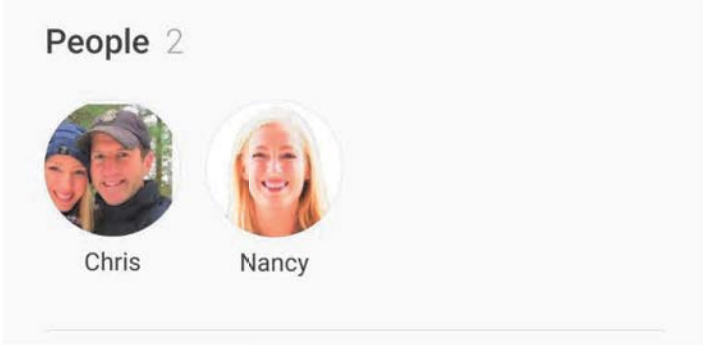
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The first person selectable thumbnail image is associated with a third set of digital photographs and videos:



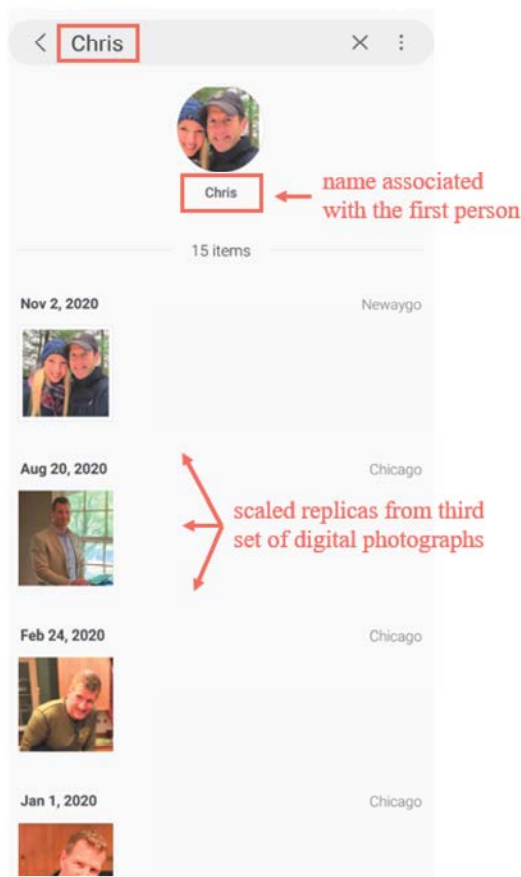
| | |
|---|---|
| <p>5[d] (ii) a name associated with the first person, the name associated with the first person being displayed adjacent to the first person selectable thumbnail image;</p> | <p>Gallery displays a name associated with the first person is displayed adjacent to the first person selectable thumbnail image, as shown below:</p>  |
| <p>5[e] (iii) a second person selectable thumbnail image including an image of a face of a second person, a fourth set of digital photographs and videos including digital photographs and videos associated with the second person; and</p> | <p>The people view includes a second person selectable thumbnail image including an image of a face of a second person:</p>  <p>As shown, the second person selectable thumbnail image is associated with a fourth set of digital photographs and videos:</p> |

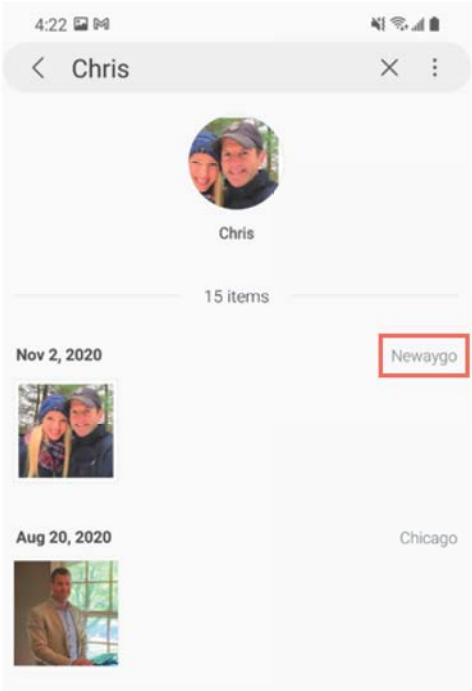
| | |
|--|---|
| |  <p>The screenshot shows a gallery interface for a contact named 'Nancy'. At the top, there is a header with a back arrow, the name 'Nancy', a close button (X), and a menu icon (three dots). Below the header is a circular profile picture of Nancy and her name. Underneath, it says '6 items'. The gallery displays a vertical list of photos with dates and locations on the right side. The photos are: 1. 'Feb 23' in 'Chicago' (a portrait of Nancy). 2. 'Nov 2, 2020' in 'Newaygo' (a photo of two people). 3. 'Jun 15, 2017' in 'Köln' (a photo of two people). 4. 'Nov 8, 2015' in 'St. Helena' (a photo of two people). A red arrow points from the text 'scaled replicas from fourth set of digital photographs' to the 'Nov 2, 2020' photo.</p> |
| <p>5[1] (iv) a name associated with the second person, the</p> | <p>A name associated with the second person is displayed adjacent to the second person selectable thumbnail image, as shown below:</p> |

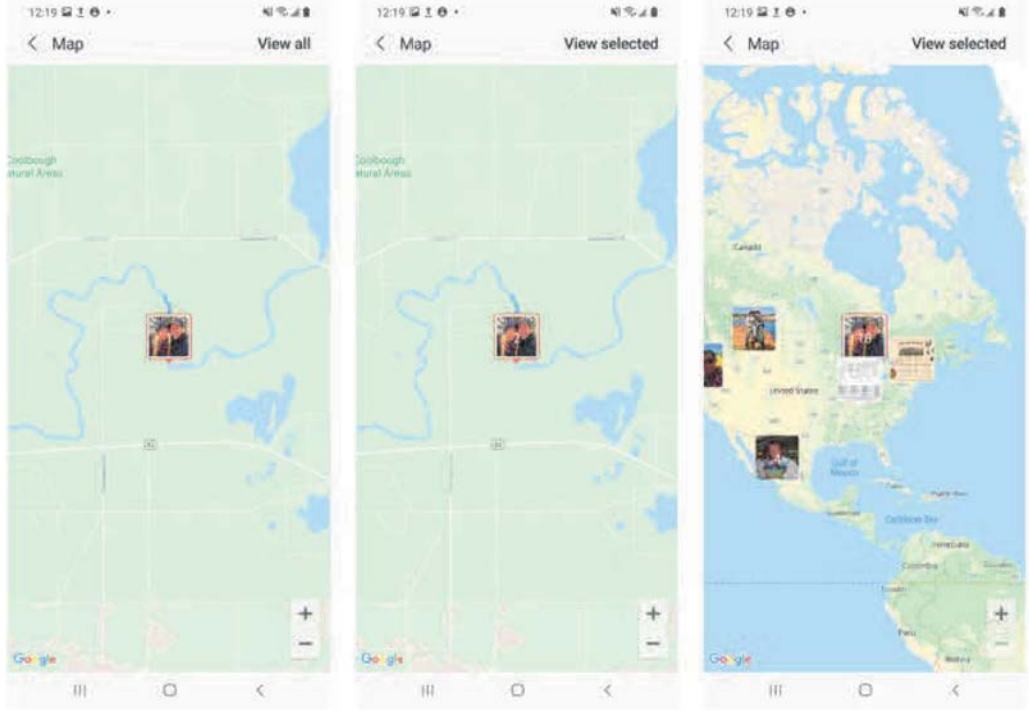
| | |
|---|---|
| <p>name associated with the second person being displayed adjacent to the second person selectable thumbnail image.</p> |  |
| <p>6. The computer-implemented method of claim 5, wherein the displaying the people view further includes displaying the first person selectable thumbnail image and the second person selectable thumbnail image in an alphabetical order based on the names associated with first person and the second person.</p> | <p>Gallery displays the first person selectable thumbnail image and the second person selectable thumbnail image in an alphabetical order (left to right) based on the names associated with first person and the second person.</p>  |

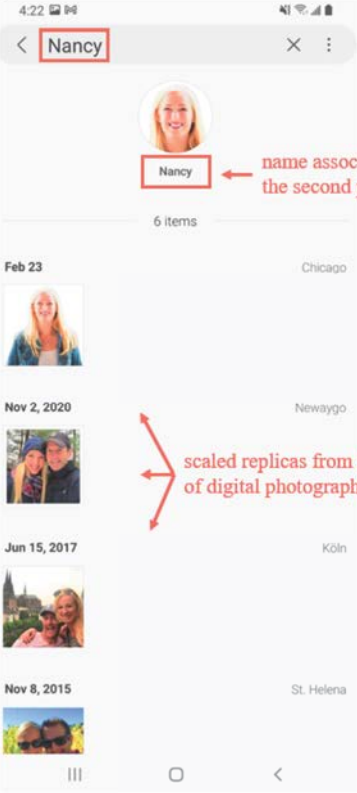
7. The computer-implemented method of claim 5, further comprising responsive to a click or tap of the first person selectable thumbnail image, displaying a first person view, the displaying the first person view including displaying (i) the name associated with the first person and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs.

Gallery displays a first person view responsive to a click or tap of the first person selectable thumbnail image. As shown, the first person view includes the name associated with the first person and a scaled replica of the photos and videos in the third set of digital photographs.

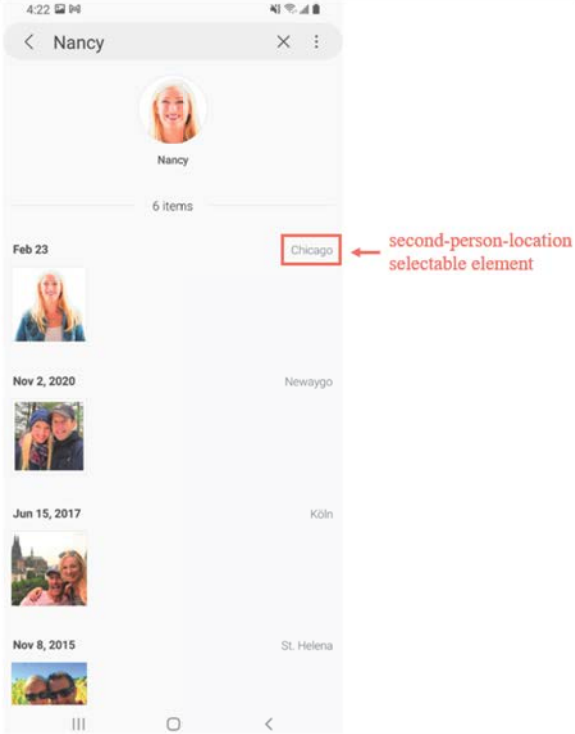


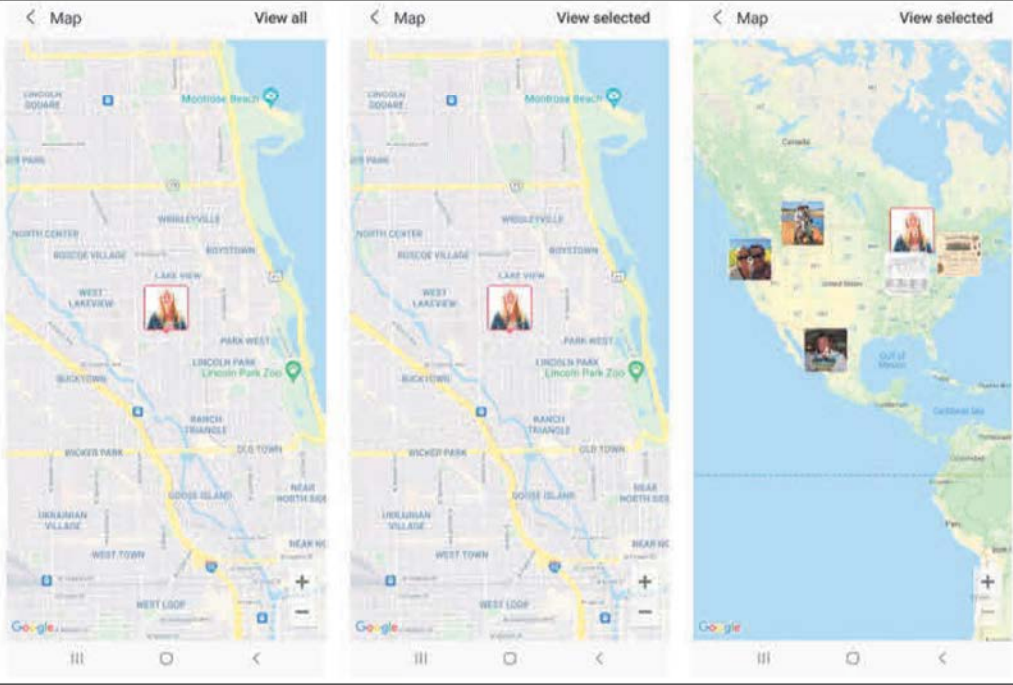
| | |
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| <p>8. The computer-implemented method of claim 7, wherein the displaying the first person view further includes displaying a first-person-location selectable element.</p> | <p>As shown below, the first person view includes a first-person-location selectable element.</p>  <p>The screenshot shows a mobile gallery interface for a contact named 'Chris'. At the top, there is a back arrow, the name 'Chris', a close button (X), and a menu icon (three dots). Below the name is a circular profile picture of two people, with the name 'Chris' underneath. A horizontal line separates the header from the content, with '15 items' centered below it. The main content area shows a photo dated 'Nov 2, 2020' with a red box around the text 'Newaygo' to its right. Below this is another photo dated 'Aug 20, 2020' with the text 'Chicago' to its right. A red arrow points from the text 'first-person-location selectable element' to the 'Newaygo' box.</p> |
| <p>9. The computer-implemented method of claim 8, further comprising</p> | <p>Clicking the first-person-location selectable element causes a representation of locations having a digital photograph or video associated with the first person.</p> |

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| <p>responsive to a click or tap of the first-person-location selectable element, displaying a representation of all locations having a digital photograph or video associated with the first person.</p> |  |
| <p>10. The computer-implemented method of claim 7, further comprising responsive to a click or tap of the second person selectable</p> | <p>Gallery displays a second person view responsive to a click or tap of the second person selectable thumbnail image. As shown, the second person view includes the name associated with the second person and a scaled replica of the photos and videos in the fourth set of digital photographs.</p> |

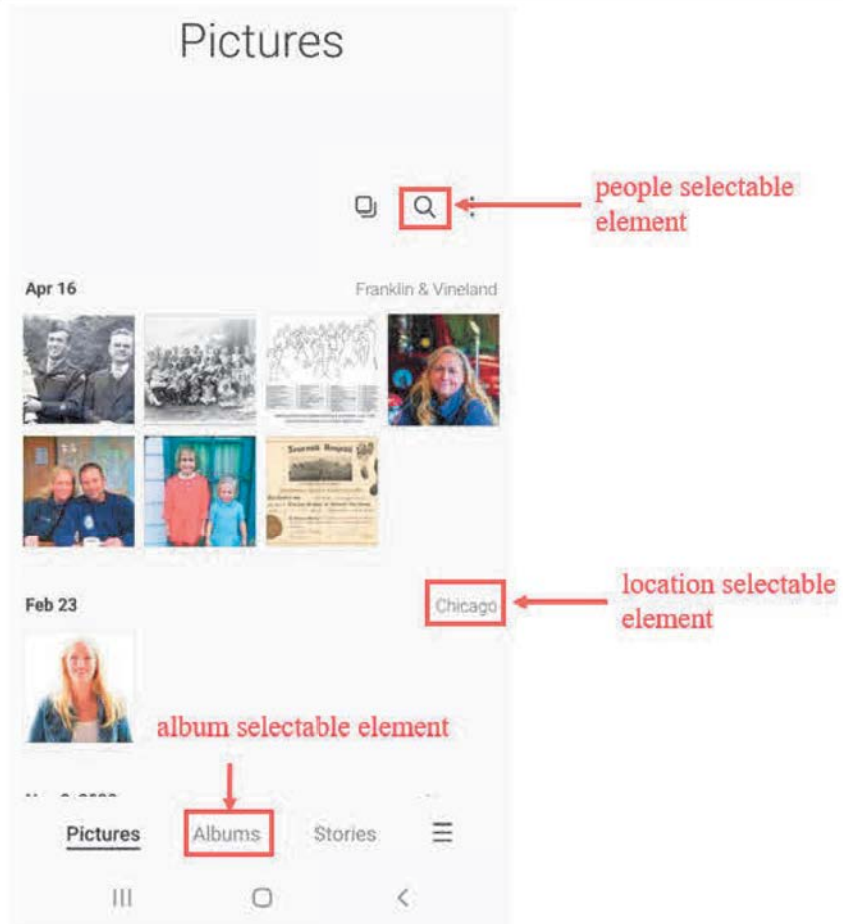
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| <p>thumbnail image, displaying a second person view, the displaying the second person view including displaying (i) the name associated with the second person and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs.</p> |  |
| <p>11. The computer-implemented method of claim 10, wherein the displaying the</p> | <p>As shown below, the second person view includes a second-person-location selectable element.</p> |

Initial Infringement Contentions – U.S. Patent No. 10,423,658 – Samsung Gallery

| | |
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| <p>second person view further includes displaying a second-person-location selectable element.</p> |  <p>The screenshot shows a mobile gallery interface for a person named Nancy. At the top, there is a header with a back arrow, the name 'Nancy', a close button (X), and a menu icon (three dots). Below the header is a profile picture of Nancy and the name 'Nancy'. Underneath, it says '6 items'. The main content area displays a vertical list of photos with associated dates and location tags. The first photo is dated 'Feb 23' and has a 'Chicago' location tag highlighted with a red box. A red arrow points from the text 'second-person-location selectable element' to this box. Other photos are dated 'Nov 2, 2020' (tagged 'Newaygo'), 'Jun 15, 2017' (tagged 'Köln'), and 'Nov 8, 2015' (tagged 'St. Helena'). The bottom of the screen shows a standard Android navigation bar with three icons.</p> |
| <p>12. The computer-implemented method of claim 11, further comprising responsive to a click or tap of the</p> | <p>Clicking the second-person-location selectable element causes a representation of locations having a digital photograph or video associated with the second person.</p> |

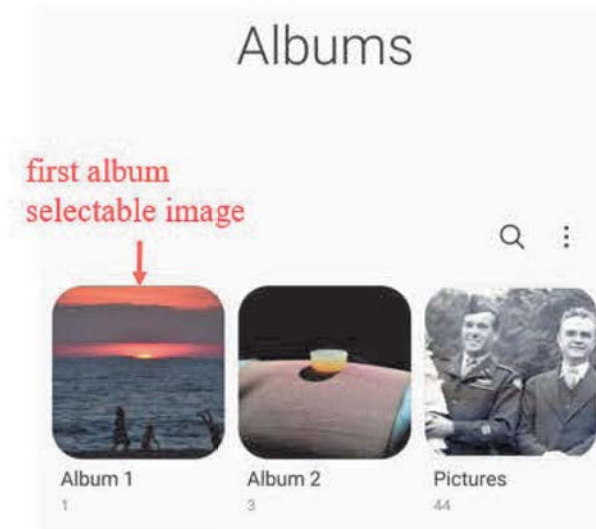
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| <p>second-person-location selectable element, displaying a representation of all locations having a digital photograph or video associated with the second person.</p> |  <p>The figure consists of three side-by-side screenshots of a mobile map application. The first screenshot, titled 'View all', shows a detailed street map of a city area with a red location pin and a small thumbnail of a person's photo. The second screenshot, titled 'View selected', shows the same map with the red pin and photo thumbnail highlighted. The third screenshot, also titled 'View selected', shows a zoomed-out view of the United States with several red location pins and photo thumbnails scattered across the country, indicating a search or selection process across a larger geographic area.</p> |
| <p>13[pre] The computer-implemented method of claim 1,</p> | <p>See information for claim 1.</p> |
| <p>13[a] wherein the plurality of selectable elements further</p> | <p>The plurality of selectable elements in the application view (<i>see</i> limitation 1[a]) further includes an album selectable element.</p> |

includes an album selectable element,

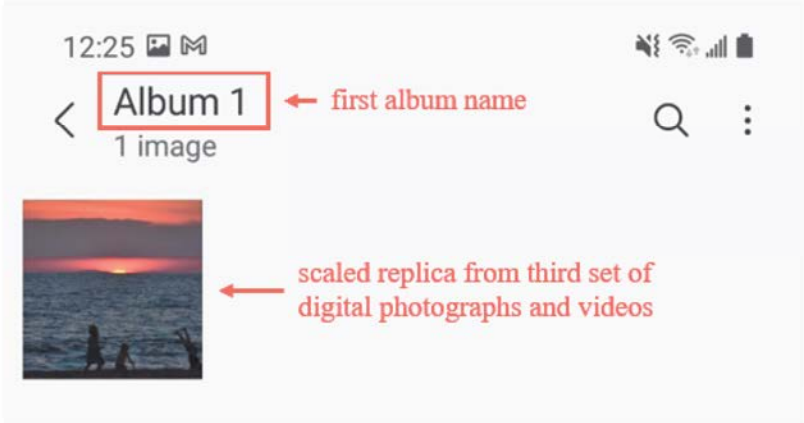


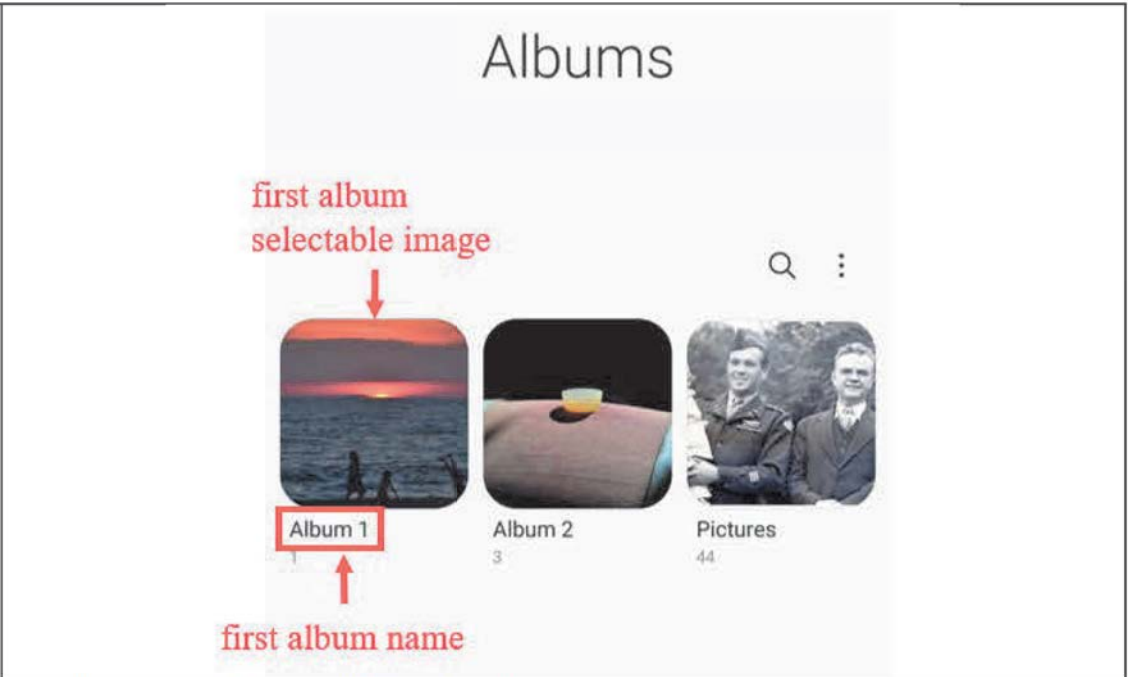
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| <p>13[b] the method further comprising responsive to a click or tap of the album selectable element, displaying an album view, the displaying the album view including displaying:</p> | <p>Gallery displays an album view responsive to a click or tap of the album selectable element.</p>  <p>The screenshot shows a mobile application interface titled "Albums". At the top, there is a search icon and a menu icon. Below this, three album thumbnails are displayed in a row. The first thumbnail is labeled "Album 1" and shows a sunset over water with the number "1" below it. The second thumbnail is labeled "Album 2" and shows a close-up of a textured surface with the number "3" below it. The third thumbnail is labeled "Pictures" and shows two men in military uniforms with the number "44" below it. At the bottom of the screen, there is a navigation bar with four items: "Pictures", "Albums" (which is underlined and bolded), "Stories", and a hamburger menu icon.</p> |
| <p>13[c][i] (i) a first album selectable thumbnail image including a scaled</p> | <p>The album view includes a first album selectable thumbnail image.</p> |

representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag;

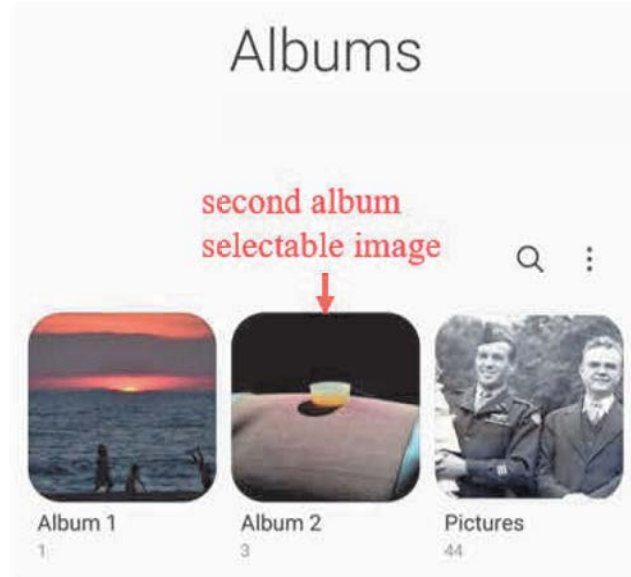


The first album selectable thumbnail includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a first album tag.

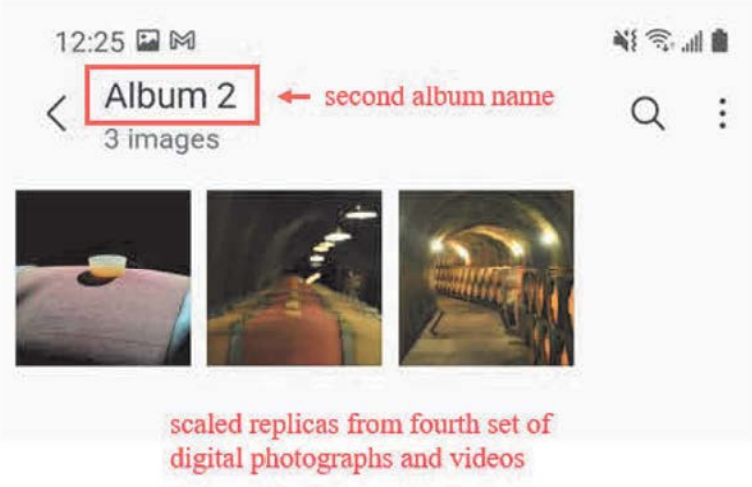
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| <p>13[c][iii] (ii) a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image;</p> | <p>The album view also includes a first album name associated with the first album, the first album name being displayed adjacent to the first album selectable thumbnail image.</p> |

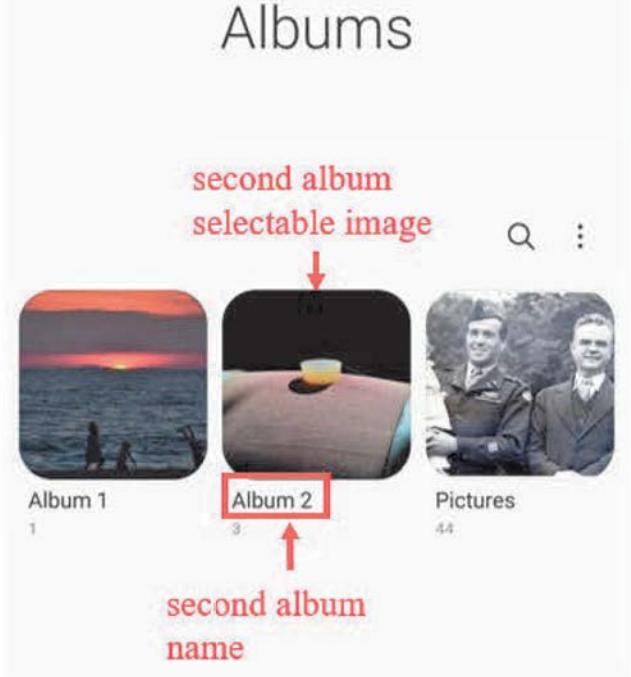
| | |
|--|---|
| |  <p>Albums</p> <p>first album selectable image</p> <p>Album 1</p> <p>Album 2</p> <p>Pictures</p> <p>first album name</p> |
| <p>13[c][iii] (iii) a second album selectable thumbnail image including a scaled representation of at least one digital photograph in a fourth set of digital photographs and</p> | <p>The album view includes a second album selectable thumbnail image.</p> |

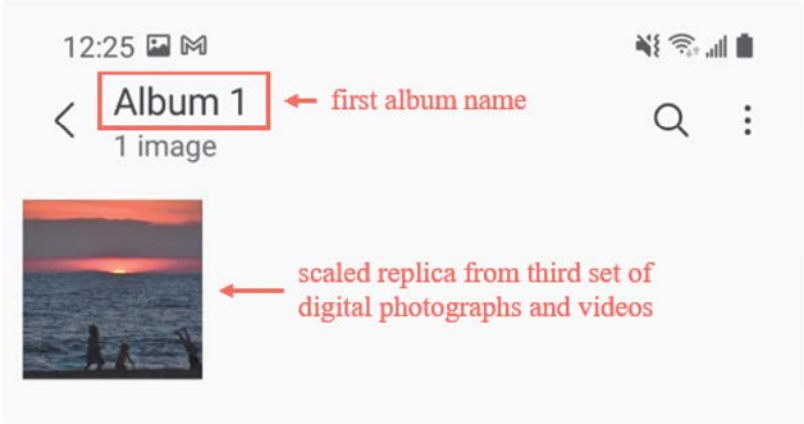
videos that includes all of the digital photographs and videos associated with a second album tag; and



The second album selectable thumbnail image includes a scaled representation of at least one digital photograph in a third set of digital photographs and videos that includes all of the digital photographs and videos associated with a second album tag.

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| |  <p>12:25 [notification icons] [status icons]</p> <p>< Album 2 ← second album name</p> <p>3 images</p> <p>[cup] [hallway] [tunnel]</p> <p>scaled replicas from fourth set of digital photographs and videos</p> |
| <p>13[c][iv] (ii) a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p> | <p>The album view also includes a second album name associated with the second album, the second album name being displayed adjacent to the second album selectable thumbnail image.</p> |

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| |  <p>The screenshot shows a gallery interface with the title 'Albums' at the top. Below the title are three album thumbnails. The first is 'Album 1' with 1 photo. The second is 'Album 2' with 3 photos, highlighted with a red box and an arrow pointing to it from the text 'second album selectable image' above and 'second album name' below. The third is 'Pictures' with 44 photos. Search and menu icons are visible in the top right corner.</p> |
| <p>14. The computer-implemented method of claim 13, further comprising responsive to a click or tap of the first album</p> | <p>See information for claim 13. Additionally, Gallery displays a first album view including (1) the first album name associated with the first album and (2) a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos responsive to a click or tap of the first album selectable thumbnail image.</p> |

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| <p>selectable thumbnail image, displaying a first album view, the displaying the first album view including displaying (i) the first album name associated with the first album and (ii) a scaled replica of each of the digital photographs and videos in the third set of digital photographs and videos.</p> |  |
| <p>15. The computer-implemented method of claim 14, further comprising responsive to a click or tap of the second album selectable thumbnail image, displaying a second album view, the displaying the</p> | <p>See information for claim 14. Additionally, Gallery displays a second album view including (1) the second album name associated with the second album and (2) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos responsive to a click or tap of the second album selectable thumbnail image.</p> |


| | |
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| <p>second album view including displaying (i) the second album name associated with the second album and (ii) a scaled replica of each of the digital photographs and videos in the fourth set of digital photographs and videos.</p> |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:25. Below the time, there is a back arrow, the album name "Album 2" (highlighted with a red box and labeled "second album name"), and "3 images". To the right are search and menu icons. Below the text are three image thumbnails: a cup on a table, a hallway with lights, and a tunnel with lights. Below the thumbnails, red text reads "scaled replicas from fourth set of digital photographs and videos".</p> |
|---|--|

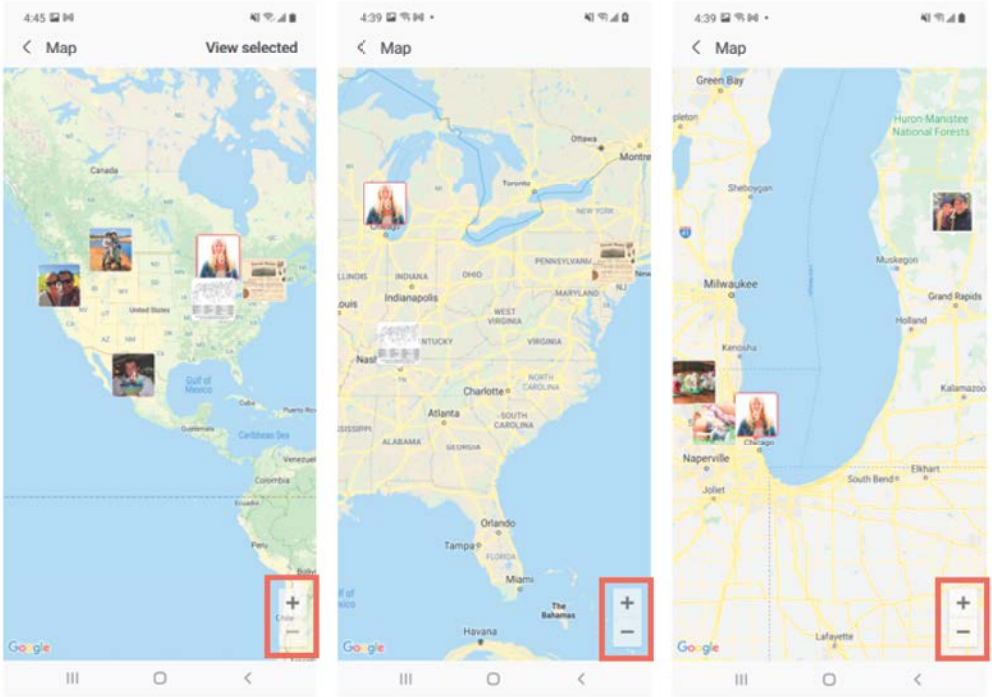
Exhibit B

Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

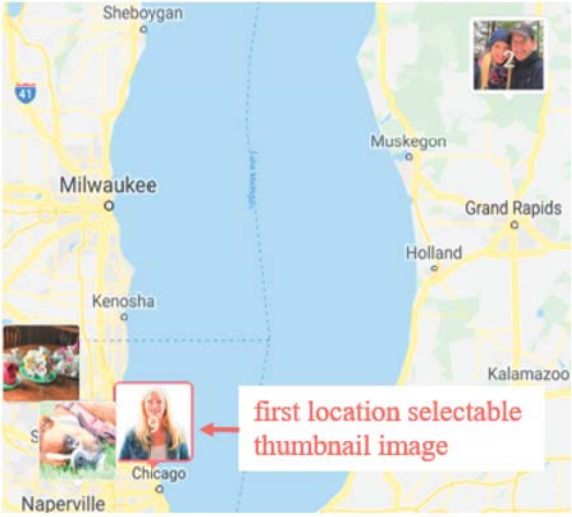
U.S. Patent No. 10,621,228 – Infringement Claim Chart

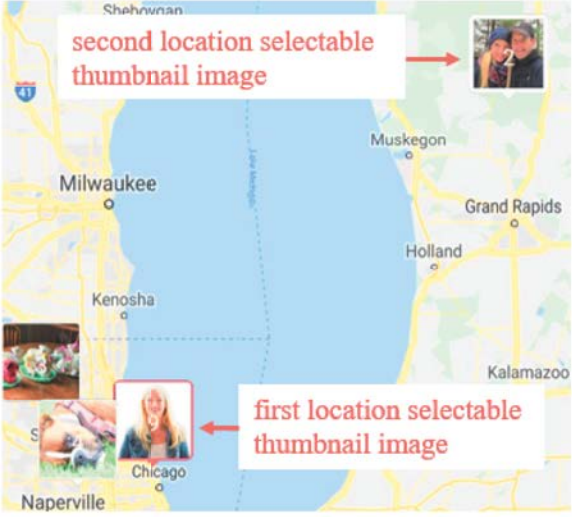
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 10,621,228 (“the ‘228 patent”) in the Samsung Gallery application (“Gallery”). The exemplary screenshots below were taken using a Samsung Galaxy A51 running Gallery Version 12.1.04.6. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

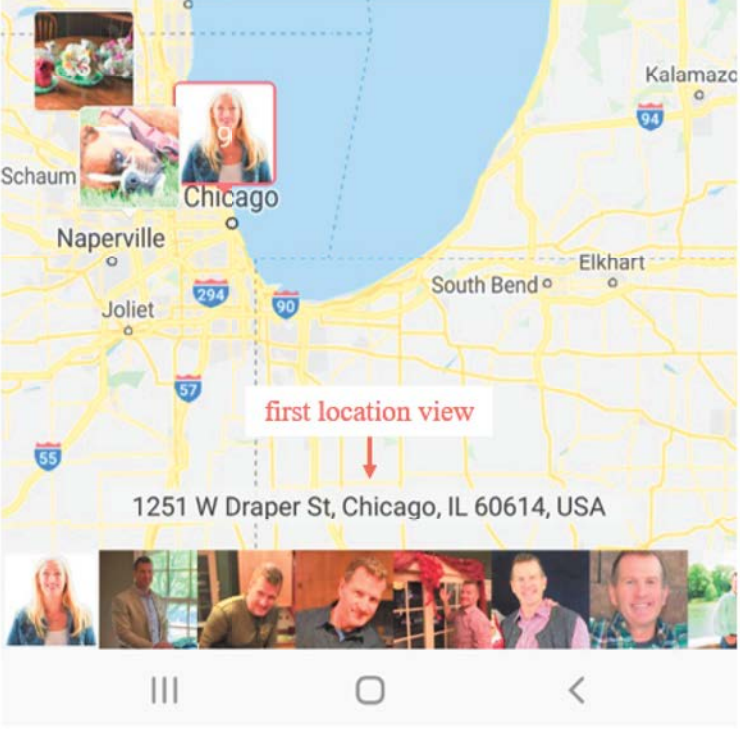
| CLAIM ELEMENT | SAMSUNG’S INFRINGEMENT |
|--|--|
| I[pre] A method comprising: | To the extent the preamble is limiting, Gallery performs a method, as detailed below. |
| I[a] responsive to a first input, causing a map view to be displayed on an interface, the map view including: | Responsive to a first input, Gallery displays a map view on an interface (e.g., a Samsung smartphone or tablet). <div data-bbox="685 1016 1208 1507" style="text-align: center;"> </div> |

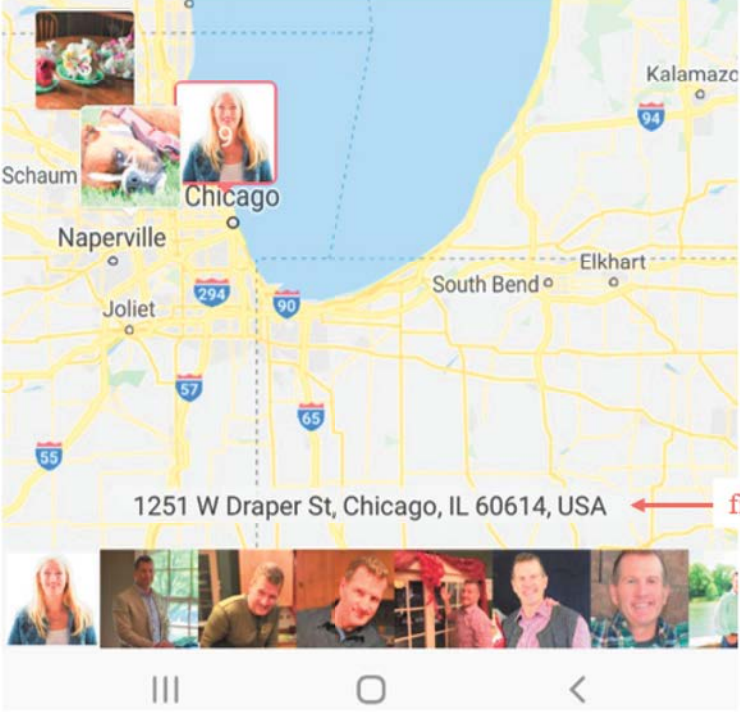
| | |
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| <p>1[a][ii] (i) an interactive map;</p> | <p>The map view includes an interactive map. The map is interactive at least because Gallery can zoom in and out, as shown below.</p>  |
| <p>1[a][iii] (ii) a first location selectable thumbnail image at a first location on the interactive map; and</p> | <p>The map view includes a first location selectable thumbnail image at a first location on the interactive map.</p> |

Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

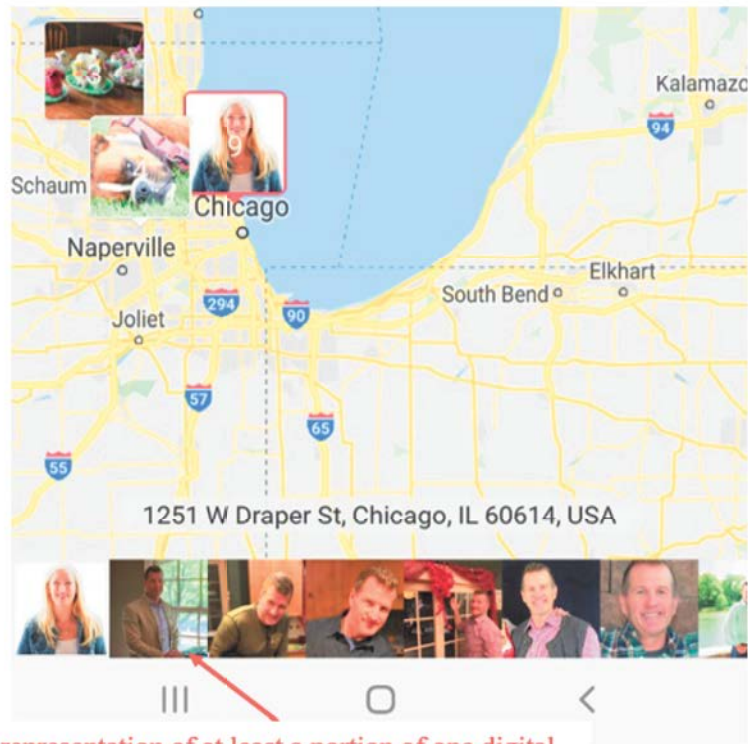
| | |
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| |  |
| <p>1[a][iii] (iii) a second location selectable thumbnail image at a second location on the interactive map;</p> | <p>The map view includes a second location selectable thumbnail image at a second location on the interactive map.</p> |

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| <p>1[b] responsive to an input that is indicative of a selection of the first location selectable thumbnail image, causing a first location view to be displayed on the interface, the first location view including</p> | <p>Responsive to an input that is indicative of a selection of the first location selectable thumbnail image, Gallery displays a first location view on the interface.</p> |

| | |
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| |  |
| <p>1[b][i] (i) a first location name associated with the first location and</p> | <p>The first location view includes a first location name associated with the first location (in this example, Chicago).</p> |

| | |
|---|---|
| |  <p>The screenshot shows a mobile gallery application interface. At the top, there are three small image thumbnails. Below them is a map of the Chicago area. A red rectangular box highlights the word "Chicago" on the map. Below the map, the address "1251 W Draper St, Chicago, IL 60614, USA" is displayed. A red arrow points from the text "first location name" to the address. At the bottom of the screen, there is a horizontal strip of six larger image thumbnails and a standard Android navigation bar with three icons: a square, a circle, and a triangle.</p> |
| <p>1[b][ii] (ii) a representation of at least a portion of one digital file in a first set of digital files, each of the digital files in the first set of digital files being produced from outputs</p> | <p>The first location view includes a representation of at least a portion of one digital file in a first set of digital files.</p> |

of one or more digital imaging devices, the first set of digital files including digital files associated with the first location;

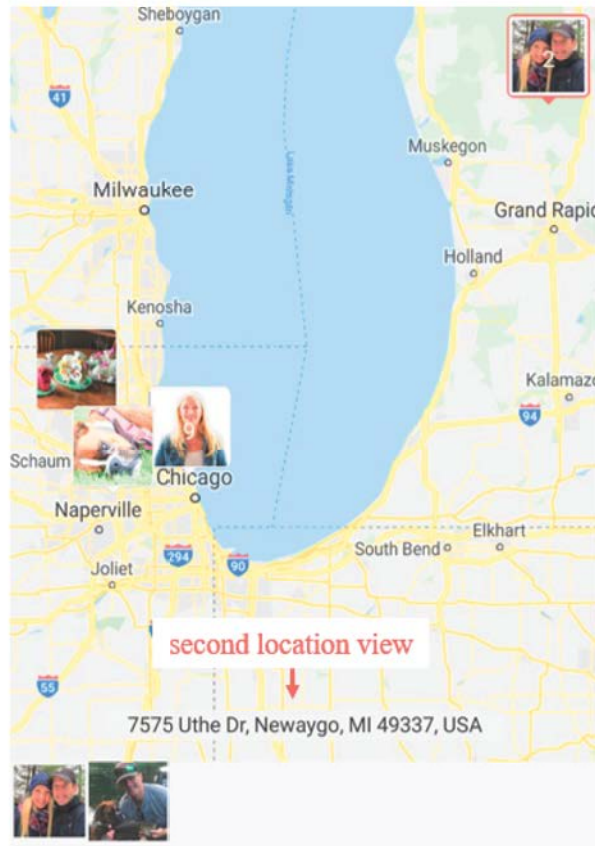


representation of at least a portion of one digital file in first set of digital files

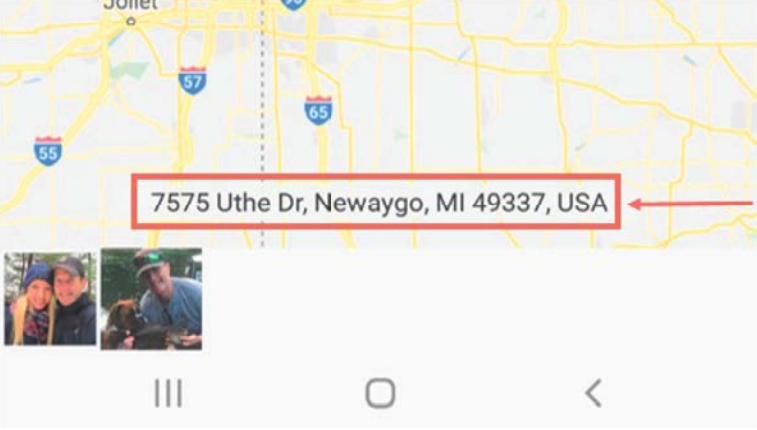
Each of the digital files in the first set of digital files are produced from outputs of one or more digital imaging devices. In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone (a digital imaging device). The first set of digital files includes digital files associated with the first location (in this example, Chicago).

1[c] responsive to an input that is indicative of a selection of the second location selectable thumbnail image, causing a second location view to be displayed on the interface, the second location view including

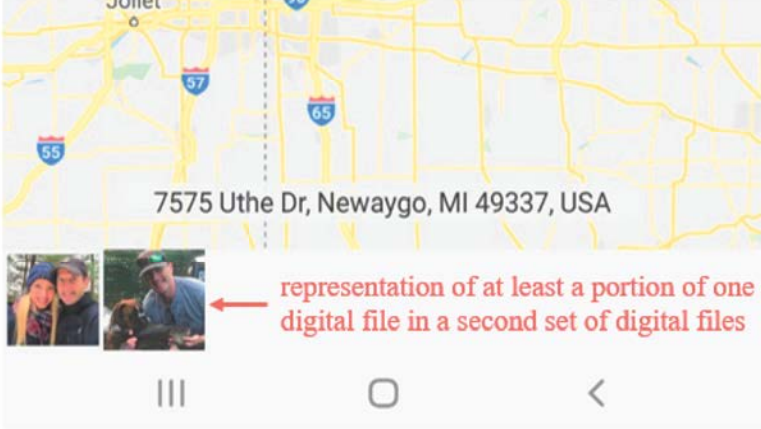
Responsive to an input that is indicative of a selection of the second location selectable thumbnail image, Gallery displays a second location view on the interface.

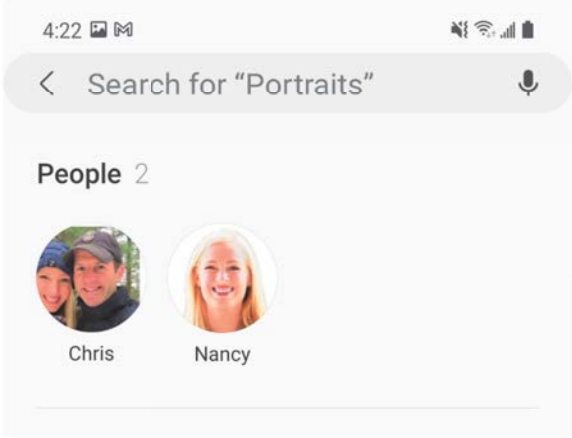
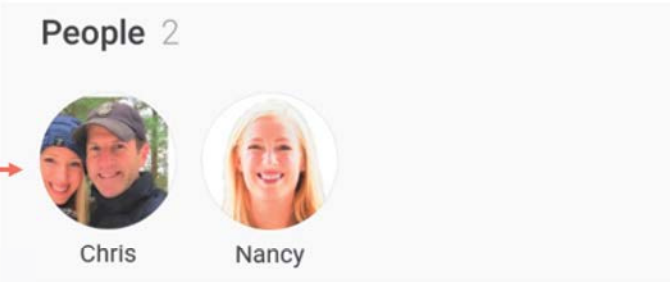


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

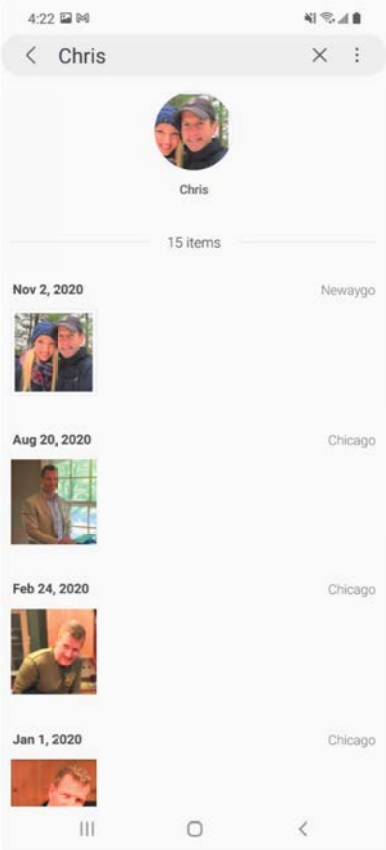
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| <p>1[c][ii] (i) a second location name associated with the second location and</p> | <p>The second location view includes a second location name associated with the second location.</p>  |
| <p>1[c][iii] (ii) a representation of at least a portion of one digital file in a second set of digital files, each of the digital files in the second set of digital files being produced from outputs of the one or more digital imaging devices, the second set of digital files including digital files associated with the second location; and</p> | <p>The second location view includes a representation of at least a portion of one digital file in a second set of digital files.</p> |



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| |  <p>The screenshot shows a mobile gallery interface. At the top, a map displays a location with the address "7575 Uthe Dr, Newaygo, MI 49337, USA". Below the map, there are two small thumbnail images of people. A red arrow points from the text "representation of at least a portion of one digital file in a second set of digital files" to the rightmost thumbnail. At the bottom of the interface, there are three navigation icons: a vertical bar, a circle, and a left-pointing arrow.</p> <p>Each of the digital files in the second set of digital files are produced from outputs of one or more digital imaging devices (e.g., a Samsung device). In this example, the one digital file in the first set of digital files was produced from outputs of an Apple iPhone (a digital imaging device). The second set of digital files includes digital files associated with the second location.</p> |
| <p>1[d] responsive to a second input that is subsequent to the first input, causing a people view to be displayed on the interface, the people view including:</p> | <p>Responsive to a second input that is subsequent to the first input, Gallery displays a people view on the interface.</p> |

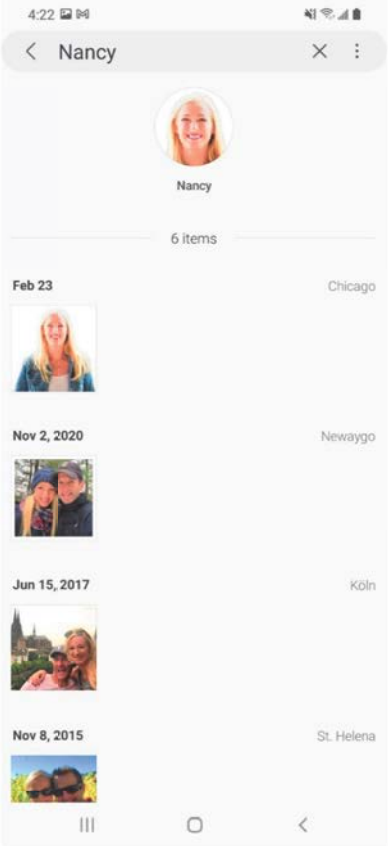
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| <p>1[d]ii (i) a first person selectable thumbnail image including a representation of a face of a first person, the first person being associated with a third set of digital files including digital photographs and videos;</p> | <p>The people view includes a first person selectable thumbnail image including a representation of a face of a first person.</p> <div style="text-align: center;">  </div> <p>The first person is associated with a third set of digital files including digital photographs and videos.</p> |

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| <p>1[d][ii] (ii) a first name associated with the first person, the first name</p> | <p>The people view includes a first name associated with the first person displayed adjacent to the first person selectable thumbnail image.</p> |

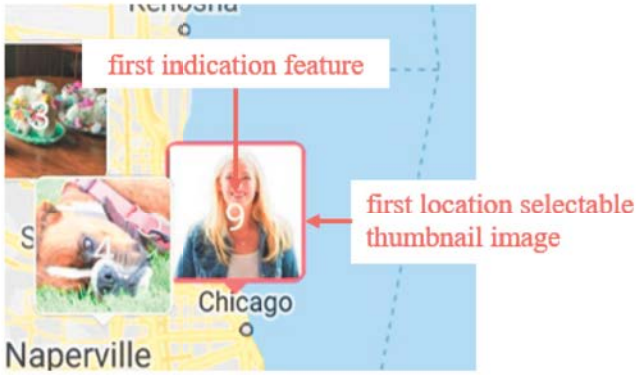
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| <p>being displayed adjacent to the first person selectable thumbnail image;</p> |  <p>People 2</p> <p>first person selectable thumbnail image</p> <p>first name associated with first person</p> <p>Chris Nancy</p> |
| <p>1[d][iii] (iii) a second person selectable thumbnail image including a representation of a face of a second person, the second person being associated with a fourth set of digital files including digital photographs and videos; and</p> | <p>The people view includes a second person selectable thumbnail image including a representation of a face of a second person.</p>  <p>People 2</p> <p>second person selectable thumbnail image</p> <p>name associated with the second person</p> <p>Chris Nancy</p> <p>The second person is associated with a fourth set of digital files including digital photographs and videos.</p> |



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| <p>1[d][iv] (iv) a second name associated with the second person, the</p> | <p>The people view also includes a second name associated with the second person. The second name being displayed adjacent to the second person selectable thumbnail image.</p> |


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| <p>second name being displayed adjacent to the second person selectable thumbnail image.</p> |  <p>People 2</p> <p>Chris Nancy</p> <p>second person selectable thumbnail image</p> <p>second name associated with the second person</p> |
| <p>2[pre] The method of claim 1, wherein</p> | <p>See information for claim 1.</p> |
| <p>2[a] the map view further includes a first indication feature associated with the first location selectable thumbnail image</p> | <p>The map view includes a first indication feature associated with the first location selectable thumbnail image.</p>  <p>first indication feature</p> <p>first location selectable thumbnail image</p> <p>Naperville Chicago</p> |


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| <p>2[b] the first indication feature being based on a number of digital files in the first set of digital files.</p> | <p>The first indication feature is based on a number of digital files in the first set of digital files. In the example below, the first indication feature includes the number 9 and the first set of digital files includes 9 digital files.</p> |
| <p>3. The method of claim 2, wherein the first indication feature is connected to the first location selectable thumbnail image.</p> | <p>As shown below, the first indication feature is connected to the first location selectable thumbnail image.</p>  |
| <p>4. The method of claim 2, wherein the first indication feature includes a first number indicative of the number of digital files in the first set of digital files.</p> | <p>The first indication feature includes a first number indicative of the number of digital files in the first set of digital files. As discussed above for limitation 2[b], in the illustrated example, the first indication feature includes the number 9 and the first set of digital files includes 9 digital files.</p> |

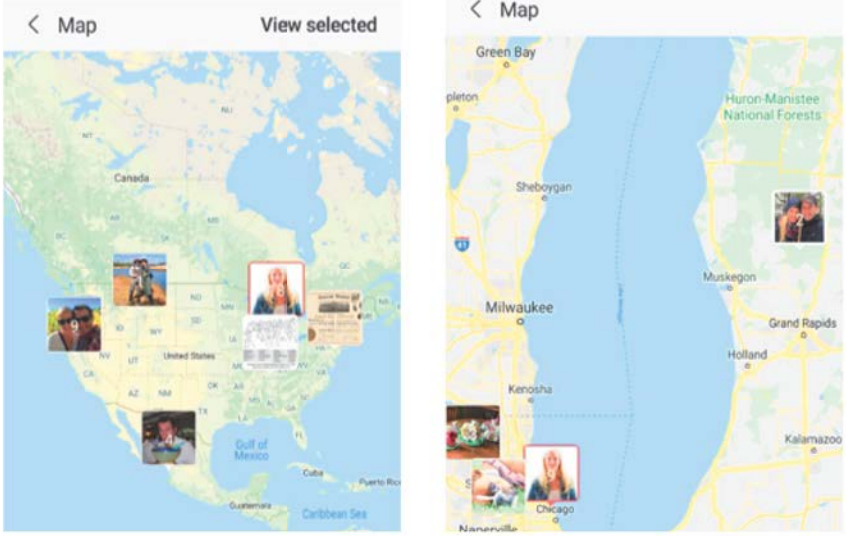
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| |  <p>The image shows a map view with several location markers. A red box highlights a thumbnail image of a woman's face, labeled '9'. A red arrow points to this thumbnail from the text 'first location selectable thumbnail image'. Another red arrow points to a red box above the map, labeled 'first indication feature'. Other markers include '3' (a cake), 'S' (a dog), and 'Chicago' (a city name). The map also shows 'Naperville' and 'Kenosha'.</p> |
| <p>5[a] The method of claim 2, wherein the map view further includes a second indication feature associated with the second location selectable thumbnail image,</p> | <p>The map view also includes a second indication feature associated with the second location selectable thumbnail image.</p>  <p>The image shows a zoomed-in map view. A red arrow points to a red box above the map, labeled 'second indication feature'. Another red arrow points to a thumbnail image of a man and a woman, labeled '2', from the text 'second location selectable thumbnail image'. The map background is green and white.</p> |

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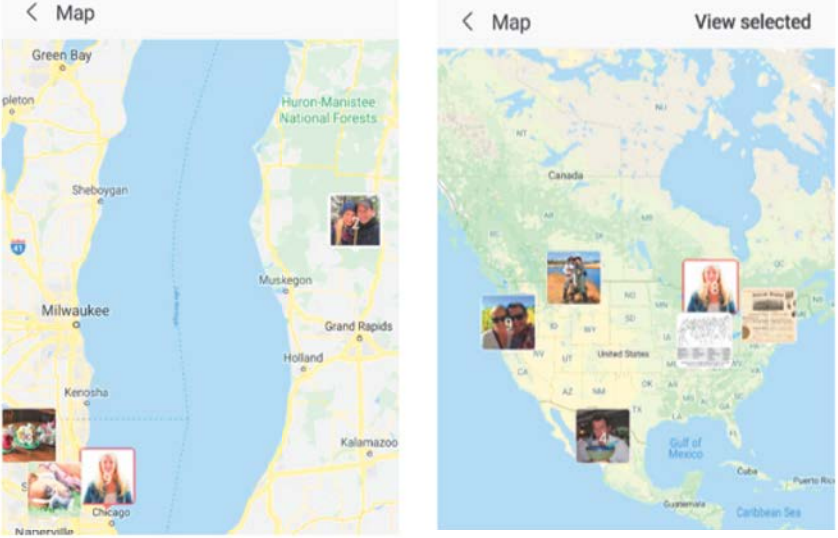
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| <p>5[b] the second indication feature being based on a number of digital files in the second set of digital files.</p> | <p>The second indication feature is based on a number of digital files in the second set of digital files. In the example below, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p> |
| <p>6. The method of claim 5, wherein the second indication feature is connected to the second location selectable thumbnail image.</p> | <p>As shown below, the second indication feature is connected to the second location selectable thumbnail image.</p>  <p>The diagram illustrates a map interface. A photo thumbnail of a man and a woman is overlaid on the map. A red arrow points from the text 'second location selectable thumbnail image' to the photo. Another red arrow points from the text 'second indication feature' to the number '2' displayed on the photo.</p> |
| <p>7. The method of claim 5, wherein the second indication feature includes a second number indicative of the number of digital files in the second set of digital files.</p> | <p>The second indication feature includes a second number indicative of the number of digital files in the second set of digital files. As discussed above for limitation 5[b], in the illustrated example, the second indication feature includes the number 2 and the second set of digital files includes 2 digital files.</p> |

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| |  <p>The diagram illustrates a map interface. A photo thumbnail of a man and a woman is overlaid on the map. A red arrow points from the text "second location selectable thumbnail image" to the photo. Another red arrow points from the text "second indication feature" to a white number "2" on the photo.</p> |
| <p>8. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, modifying the first indication feature.</p> | <p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming in on the interactive map, Gallery modifies the first indication feature. In the example below, the first indication feature is modified from 18 to 9 responsive to zooming in.</p> |

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| <p>9. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, modifying the first indication feature.</p> | <p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of zooming out on the interactive map, Gallery modifies the first indication feature. In the example below, the first indication feature is used as an illustrative example where the indication is modified from 9 to 18 responsive to zooming out.</p> |

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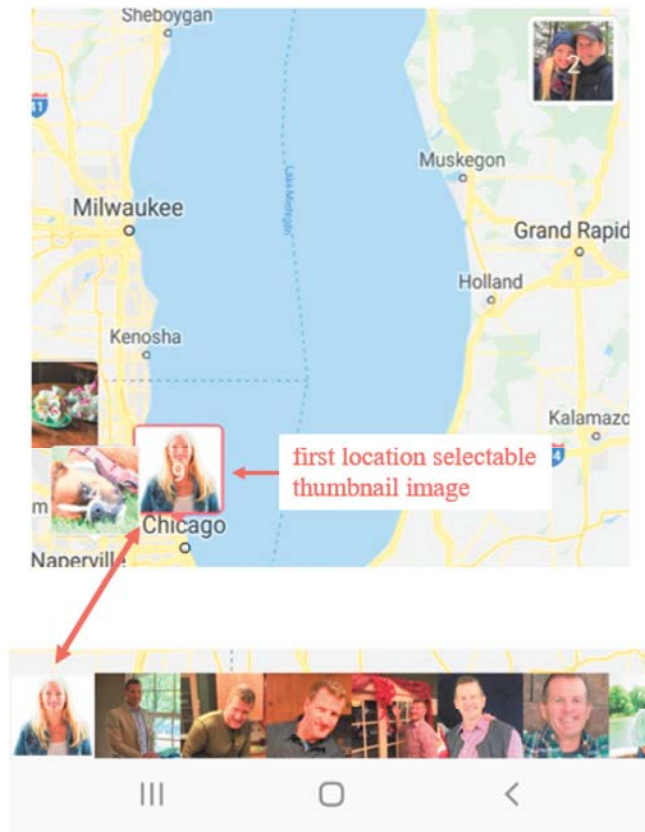
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| <p>10. The method of claim 2, further comprising, subsequent to the map view being displayed on the interface, responsive to an input that is indicative of a filter selection, modifying the first indication feature.</p> | <p>Subsequent to the map view being displayed on the interface, responsive to an input that is indicative of a filter selection (e.g., selecting the “View selected” element), Gallery modifies the first indication feature (e.g., from including the number 9 to including the number 1).</p> |

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| <p>12[pre] The method of claim 1, wherein</p> | <p>See information for claim 1.</p> |

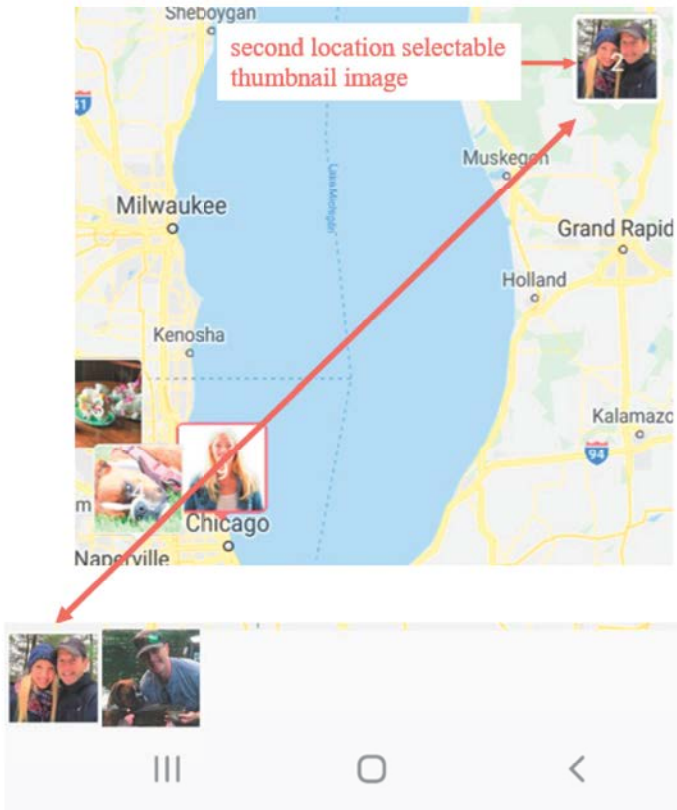
12[a] the first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files, and

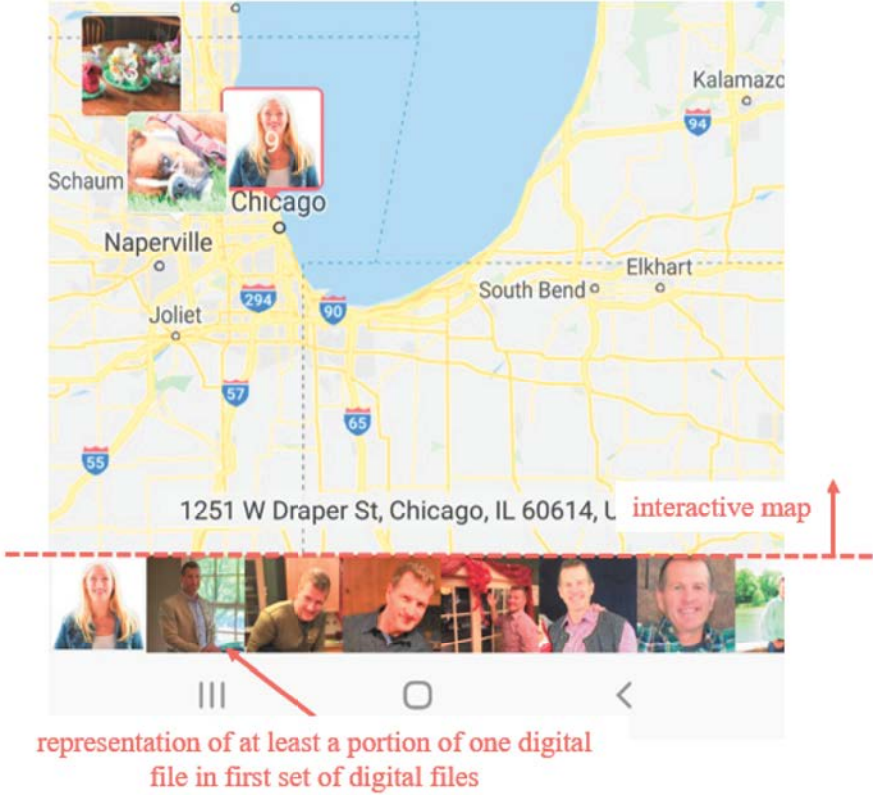
The first location selectable thumbnail image includes a representation of at least one of the digital files in the first set of digital files.

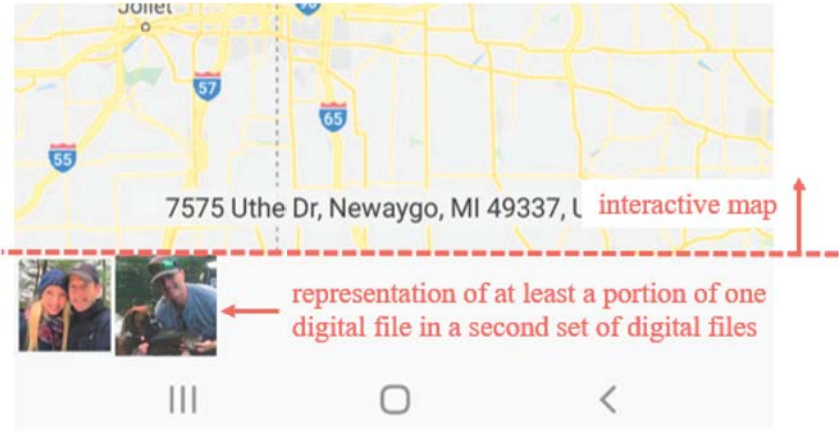


12[b] wherein the second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.

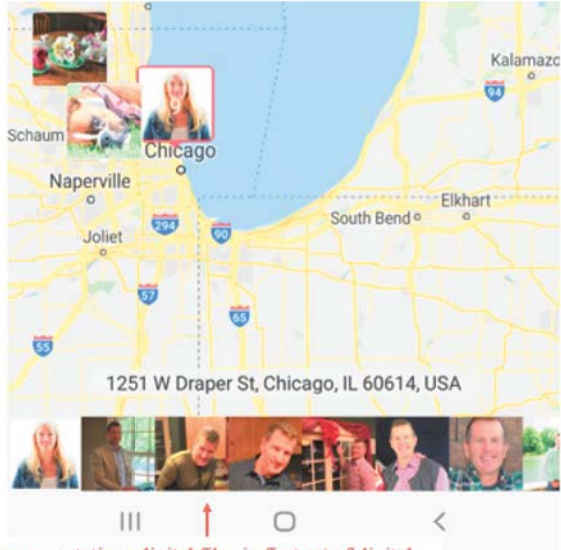
The second location selectable thumbnail image includes a representation of at least one of the digital files in the second set of digital files.



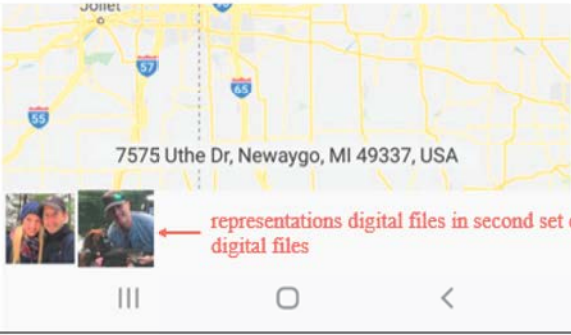
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| <p>13[pre] The method of claim 12 wherein</p> | <p>See information for claim 12.</p> |
| <p>13[a] the representation of the at least a portion of the one digital file in the first set of digital files is not overlaid on the interactive map, and</p> | <p>The representation of the at least a portion of the one digital file in the first set of digital files is not overlaid on the interactive map.</p>  <p>1251 W Draper St, Chicago, IL 60614, U interactive map</p> <p>representation of at least a portion of one digital file in first set of digital files</p> |

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| <p>13[b] wherein the representation of the at least a portion of the one digital file in the second set of digital files is not overlaid on the interactive map.</p> | <p>The representation of the at least a portion of the one digital file in the second set of digital files is not overlaid on the interactive map.</p>  <p>The image shows a mobile application interface. The top portion displays a map with yellow roads and blue highway shields (55, 57, 65). A white text box on the map reads "7575 Uthe Dr, Newaygo, MI 49337, U". To the right of this text box is the label "interactive map" with a red arrow pointing upwards. A red dashed horizontal line separates the map from the bottom portion. Below the line, there are two small photo thumbnails. A red arrow points from the label "representation of at least a portion of one digital file in a second set of digital files" to the left thumbnail. At the bottom of the screen are three navigation icons: a vertical bar, a circle, and a left-pointing chevron.</p> |
| <p>14[pre] The method of claim 1, wherein</p> | <p>See information for claim 1.</p> |
| <p>14[a] the first location view includes a representation of at least a portion of all of the digital files in the first set of digital files and</p> | <p>The first location view includes a representation of at least a portion of all of the digital files in the first set of digital files.</p> |


Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

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| |  <p>representations digital files in first set of digital files</p> |
| <p>14[b] the second location view includes a representation of at least a portion of all of the digital files in the second set of digital files.</p> | <p>The second location view includes a representation of at least a portion of all of the digital files in the second set of digital files.</p> |


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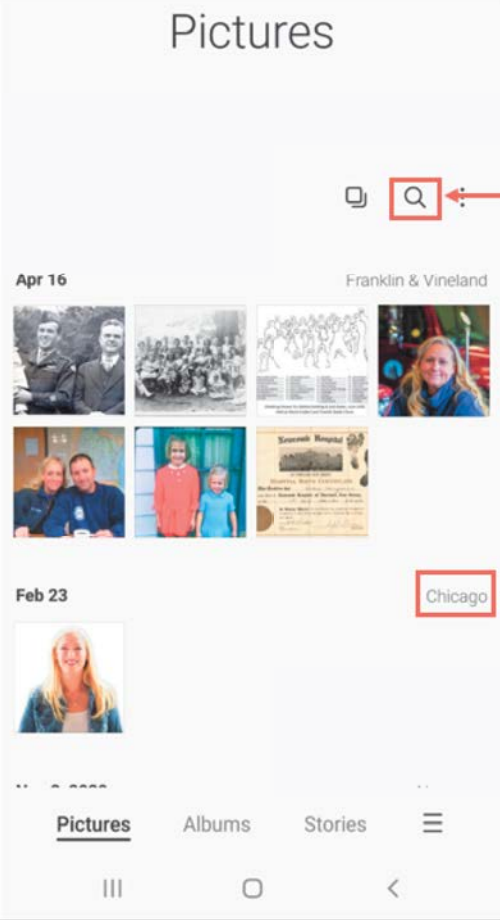
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| <p>15[pre] The method of claim 1, further comprising:</p> | <p>See information for claim 1.</p> |
| <p>15[a] responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, causing a first digital file to be displayed on the interface; and</p> | <p>Responsive to an input that is indicative of a selection, in the first location view, of the representation of the at least a portion of the one digital file in the first set of digital files, Gallery causes a first digital file to be displayed on the interface.</p> |

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| |  <p>12:01 [signal icons] [battery icon]</p> <p>Aug 20, 2020 9:35 PM</p> <p>← first digital file</p> <p>1.86 MB 3024x4032 /Internal storage/Pictures</p> |
| <p>15[b] responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital filed, causing a second digital</p> | <p>Responsive to an input that is indicative of a selection, in the second location view, of the representation of the at least a portion of the one digital file in the second set of digital filed, Gallery causes second digital file to be displayed on the interface.</p> |

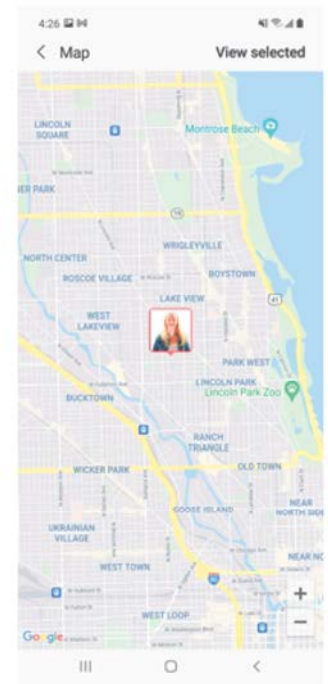
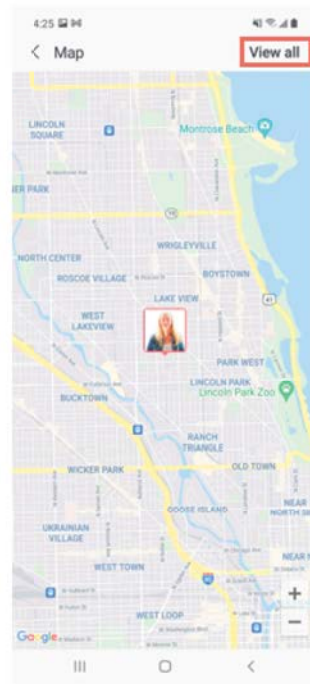
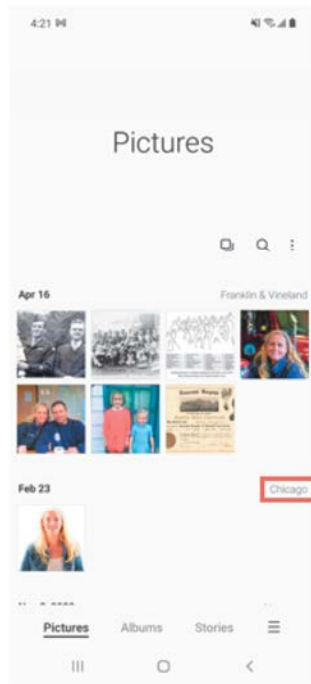
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

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| <p>file to be displayed on the interface.</p> |  <p>12:06 [signal icons]</p> <p>Aug 6, 2019 6:30 AM</p> <p>2.59 MB 1770x2105</p> <p>/Internal storage/Pictures</p> <p>← second digital file</p> |
| <p>17[a] The method of claim 1, further comprising, prior to receiving the first input, causing the interface to display a plurality of selectable elements, the plurality of selectable elements including a location selectable element and a people selectable element,</p> | <p>Prior to receiving the first input (see information for element 1[a]), Gallery causes the interface to display a plurality of selectable elements. The plurality of selectable elements includes a location selectable element and a people selectable element.</p> |

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| |  <p>The screenshot shows a mobile gallery interface. At the top, the word "Pictures" is displayed. Below it, there is a search icon (magnifying glass) inside a red box, with a red arrow pointing to it from the text "people selectable element". The gallery content is organized by date. The first date is "Apr 16" with the location "Franklin & Vineland". Below this date are several photo thumbnails, including a group of people and a portrait of a woman. The second date is "Feb 23", with a location tag "Chicago" highlighted in a red box and labeled "location selectable element" with a red arrow. At the bottom of the screen, there are navigation tabs for "Pictures", "Albums", and "Stories", along with a hamburger menu icon.</p> |
| <p>17[b] wherein the first input is indicative of a</p> | <p>The first input is indicative of a selection of the location selectable element. See information for limitation 1[a].</p> |

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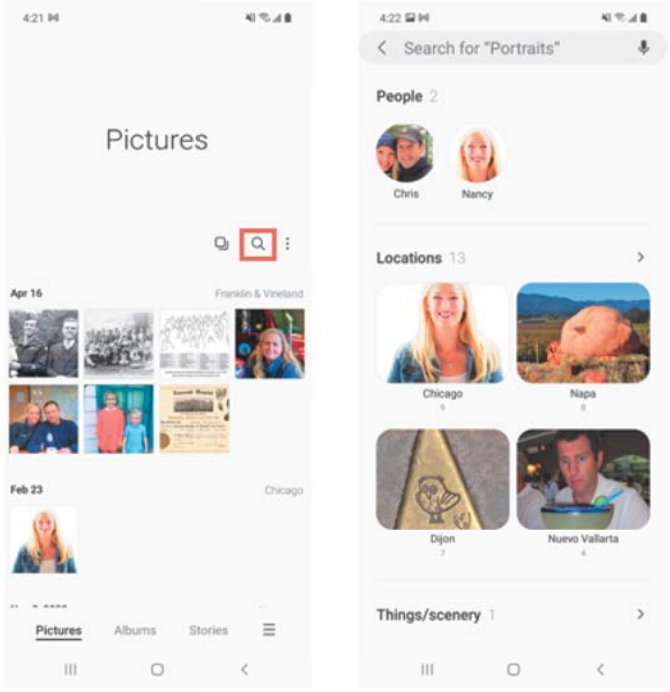
selection of the location
selectable element, and



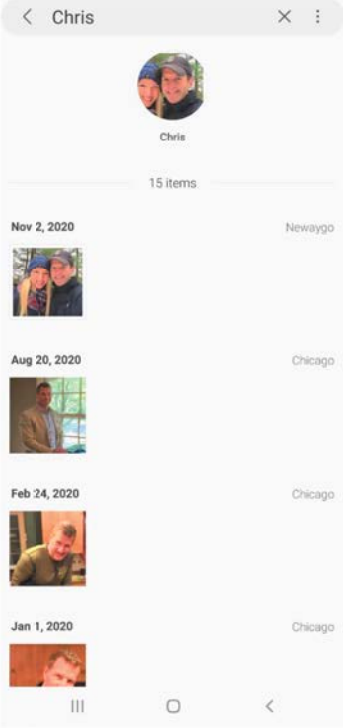
17[c] wherein the second
input is indicative of a
selection of the people
selectable element.

The second input is indicative of a selection of the people selectable element. See information for limitation 1[d].

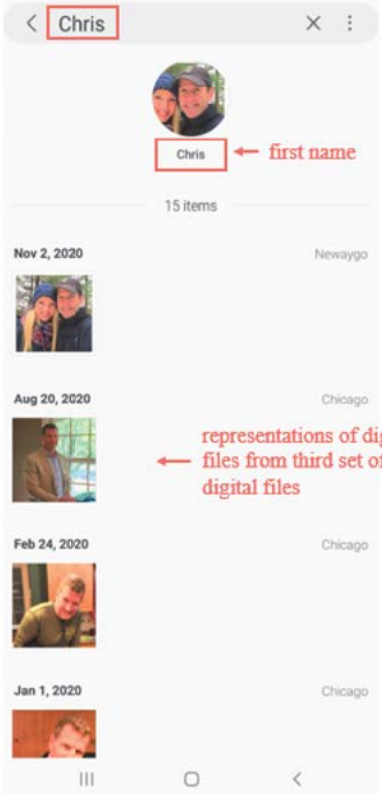
Initial Infringement Contentions – U.S. Patent No. 10,621,228 – Samsung Gallery

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| <p>18<pre>[pre]</pre> The method of claim 1, further comprising</p> | <p><i>See information for claim 1.</i></p> |
| <p>18[a] responsive to an input that is indicative of a selection of the first person selectable thumbnail image,</p> | <p>Responsive to an input that is indicative of a selection of the first person selectable thumbnail image, Gallery displays a first person view on the interface.</p> |

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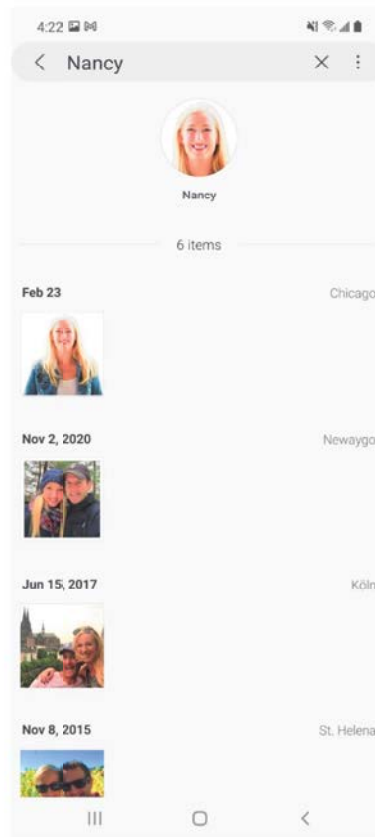
| | |
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| <p>causing a first person view to be displayed on the interface, the first person view including</p> |  |
| <p>18[b] (i) the first name and (ii) a representation of each digital file in the third set of digital files.</p> | <p>The first person view includes the first name and a representation of each digital file in the third set of digital files.</p> |

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| <p>19[pre] The method of claim 18, further comprising</p> | <p>.See information for claim 18.</p> |

19[a] responsive to an input that is indicative of a selection of the second person selectable thumbnail image, causing a second person view to be displayed on the interface, the second person view including

Responsive to an input that is indicative of a selection of the second person selectable thumbnail image, Gallery causes a second person view to be displayed on the interface.



19[b] (i) the second name and (ii) a representation of each digital file in the fourth set of digital files.

The second person view includes the second name and a representation of each digital file in the fourth set of digital files.

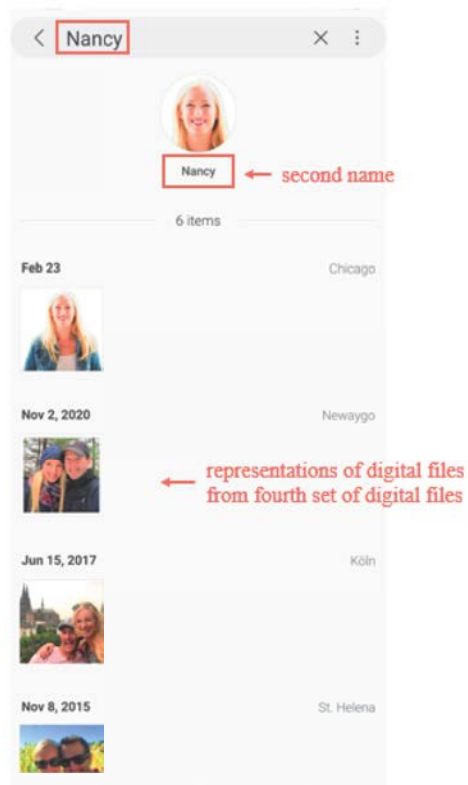


Exhibit C

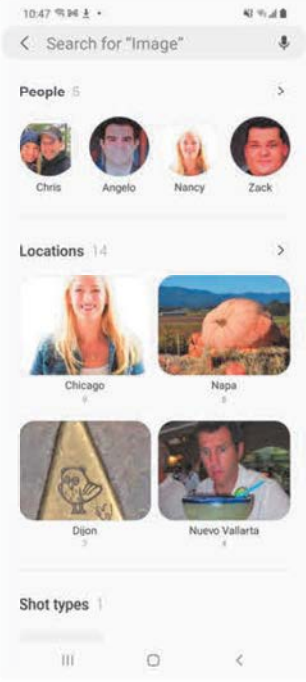
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

U.S. Patent No. 11,163,823 – Infringement Claim Chart

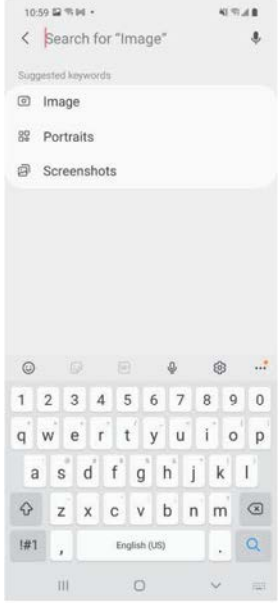
The following chart identifies a location of each and every element of every asserted claim of U.S. Patent No. 11,163,823 (“the ‘823 patent”) in the Samsung Gallery application (“Gallery”). The exemplary screenshots below were taken using a Samsung Galaxy A51 running Gallery Version 12.1.09.0. While various views with one or more photographs are shown for exemplary purposes below, it should be understood that each view can include more or less photographs, and/or videos. Additionally, while one or more photographs or videos are shown at various locations for exemplary purposes, it should be understood that each location can include more or less associated photographs and/or videos.

| CLAIM ELEMENT | SAMSUNG’S INFRINGEMENT |
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| 1[pre] A method comprising: | To the extent the preamble is limiting, Gallery performs a method, as detailed below. |
| 1[a] causing an interface to display a search-filter view, the search-filter view permitting a user to filter a plurality of digital files based on one or more criteria; | Gallery causes an interface to display a search-filter view. |

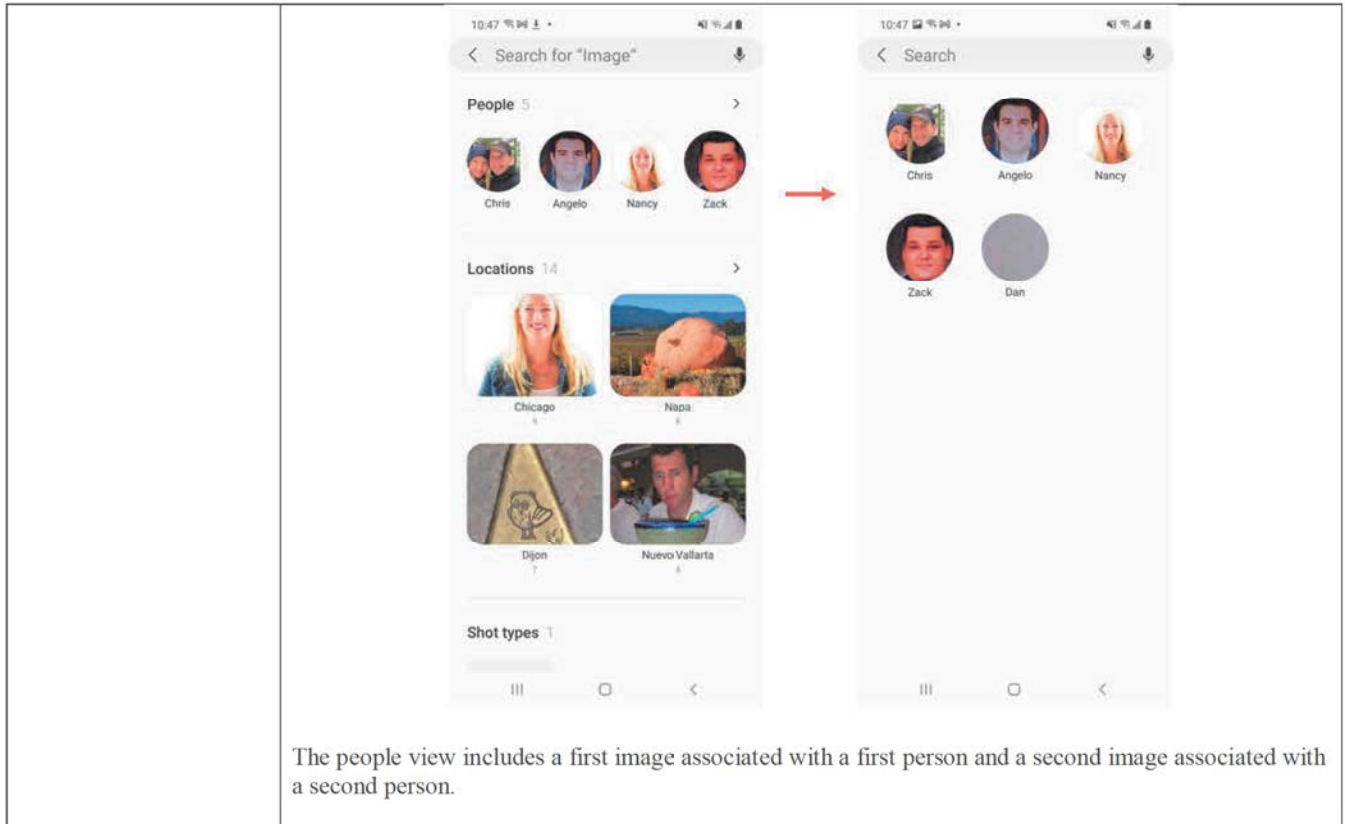
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| |  <p>The screenshot shows a mobile gallery application interface. At the top, the status bar displays the time 10:47 and various icons. Below the status bar is a search bar with the text "Search for 'Image'" and a microphone icon. The search results are categorized into three sections: "People" with 5 items, "Locations" with 14 items, and "Shot types" with 1 item. The "People" section shows four circular profile pictures labeled "Chris", "Angelo", "Nancy", and "Zack". The "Locations" section shows four square thumbnails: a woman's face labeled "Chicago", a landscape with a large rock labeled "Napa", a road sign labeled "Dijon", and a man's face labeled "Nuevo Vallarta". The "Shot types" section is currently empty. At the bottom of the screen are three navigation icons: a list icon, a home icon, and a back icon.</p> <p>The search-filter view permits a user to filter a plurality of digital files based on one or more criteria, for example, by entering text into the search box. Gallery also suggests search keywords, such as “Image,” “Portraits,” and “Screenshots.”</p> |
|--|--|

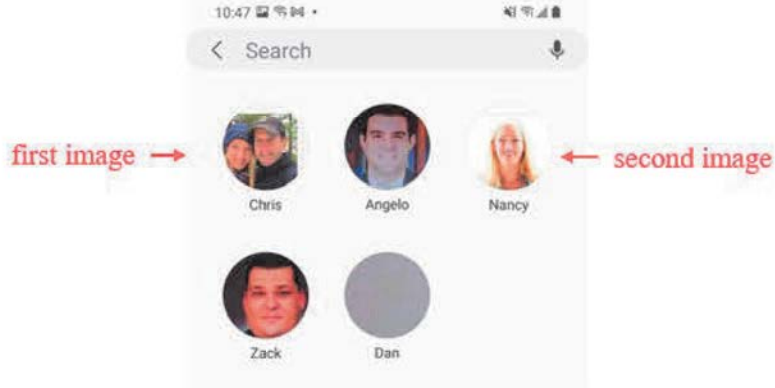
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| <p>1(b) responsive to a first input within the search-filter view, causing the interface to display a people view including a first image associated with a first person and a second image associated with a second person;</p> | <p>Responsive to a first input within the search-filter view (e.g., clicking or tapping the arrow to the right of “People”), Gallery causes the interface to display a people view.</p> |

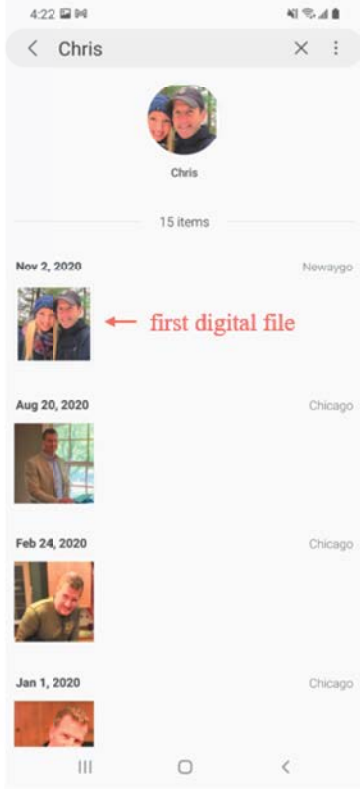
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery



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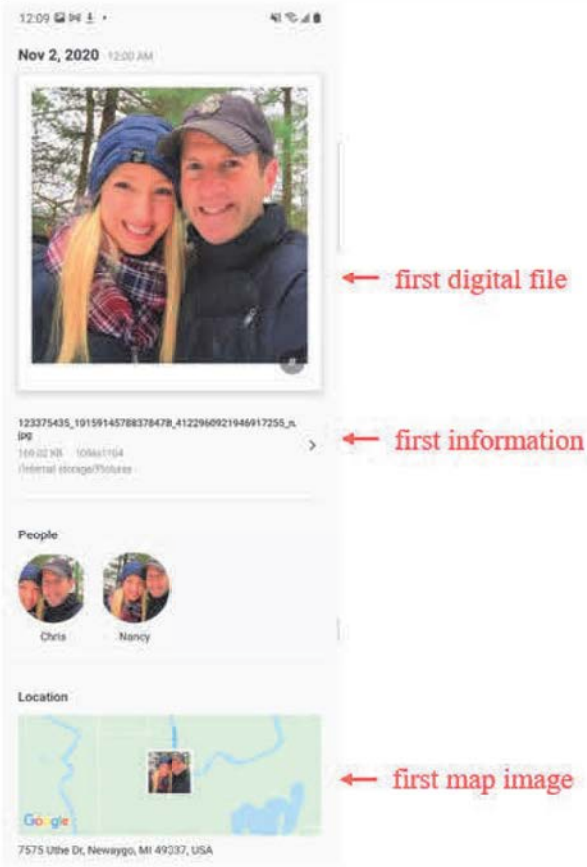
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| |  <p>The screenshot shows a mobile gallery search interface. At the top, there is a search bar with a back arrow, the word "Search", and a microphone icon. Below the search bar, five circular profile pictures are displayed in a grid. The first row contains three images: Chris, Angelo, and Nancy. The second row contains two images: Zack and Dan. Red arrows point to the Chris image from the left, labeled "first image", and to the Nancy image from the right, labeled "second image".</p> |
| <p>1[c] responsive to an input that is indicative of a selection associated with the first person, causing a first person view to be displayed on the interface, the first person view including a first digital file associated with the first person;</p> | <p>Responsive to an input that is indicative of a selection associated with the first person (e.g., clicking or tapping the first image in the people view), Gallery causes a first person view to be displayed on the interface. The first person view includes a first digital file associated with the first person.</p> |

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| <p>1[d] responsive to an input that is indicative of a selection associated with the first digital file, causing a first detail</p> | <p>Responsive to an input that is indicative of a selection associated with the first digital file (e.g., clicking or tapping the first digital file displayed in the first person view), Gallery causes a first detail view to be displayed on the interface. The first detail view includes (i) the first digital file, (ii) first information associated with the first digital file and (iii) a first map image associated with the first digital file.</p> |

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view to be displayed on the interface, the first detail view including (i) the first digital file, (ii) first information associated with the first digital file and (iii) a first map image associated with the first digital file,



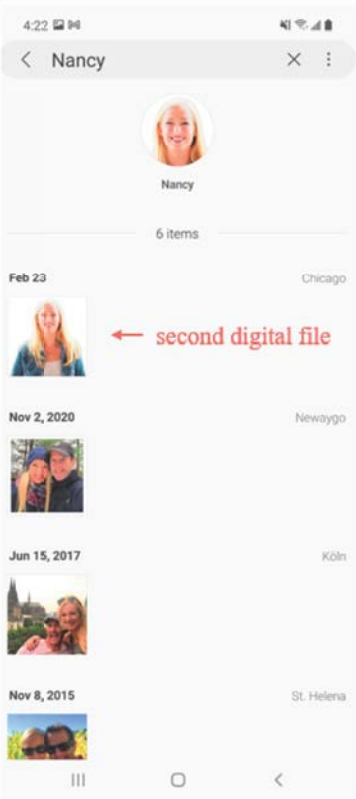
1[d][i] the first digital file having a first size in the first person view and


The first digital file has a first size in the first person view and a second size in the first detail view. The second size is greater than the first size.

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| <p>a second size in the first detail view, wherein the second size is greater than the first size</p> | |
| <p>1[e] responsive to an input that is indicative of a selection associated with the second person, causing a second person view to be displayed on the interface, the second person view including a</p> | <p>Responsive to an input that is indicative of a selection associated with the second person (e.g., clicking or tapping the second image in the people view), Gallery causes a second person view to be displayed on the interface. The second person view includes a second digital file associated with the second person.</p> |

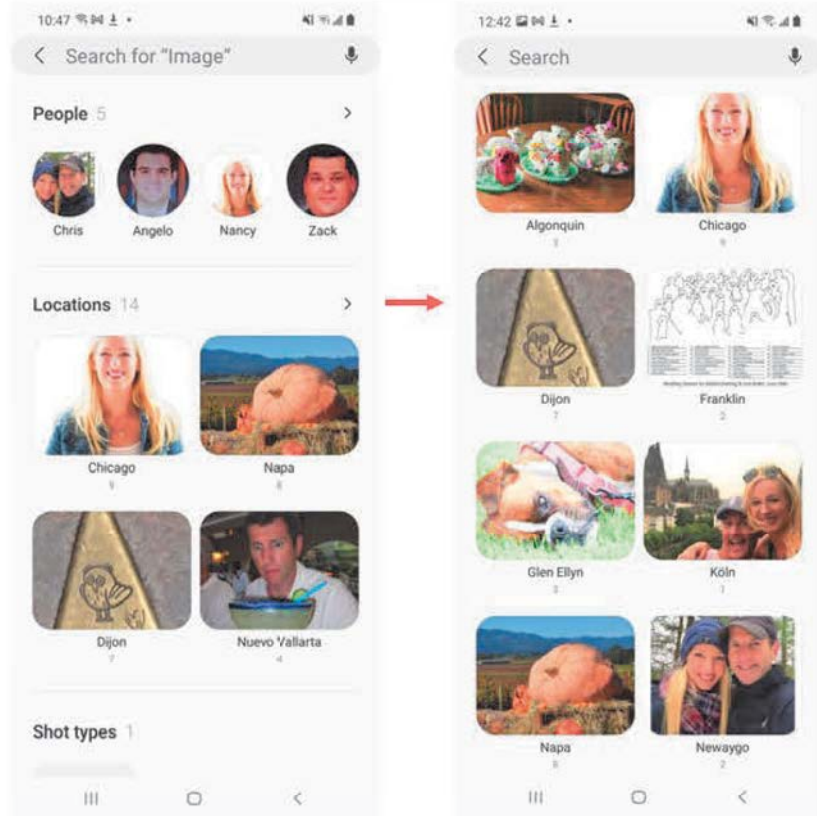
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| <p>second digital file associated with the second person;</p> |  |
| <p>1(f) responsive to an input that is indicative of a selection associated with the second digital file, causing a second</p> | <p>Responsive to an input that is indicative of a selection associated with the second digital file (e.g., clicking or tapping the second digital file in the second person view), Gallery causes a second detail view to be displayed on the interface, the second detail view including (i) the second digital file, (ii) second information associated with the second digital file and (iii) a second map image associated with the second digital file.</p> |

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| <p>detail view to be displayed on the interface, the second detail view including (i) the second digital file, (ii) second information associated with the second digital file and (iii) a second map image associated with the second digital file; and</p> |  <p>The screenshot shows a mobile gallery interface. At the top, it displays the time '12:09' and battery status. Below that, the date 'Feb 23' and time '2:56 PM' are shown. The main content is a photo of a woman with blonde hair wearing a denim jacket. Below the photo, there is a file name 'nancy transparent.png', its size '381.33 KB', and a date '2018x1907'. Underneath, there is a 'People' section with a small circular profile picture and the name 'Nancy'. At the bottom, there is a 'Location' section with a map showing a location in Chicago, IL, with the address '1251 W Draper St, Chicago, IL 60614, USA'. Three red arrows point to the photo, the file information, and the map, with labels 'second digital file', 'second information', and 'second map image' respectively.</p> |
| <p>1[g] responsive to a second input within the search-filter view, causing the interface to display a locations view including a first name</p> | <p>Responsive to a second input within the search-filter view (e.g., clicking or tapping the arrow to the right of “Locations”), Gallery causes the interface to display a locations view.</p> |


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associated with a first location, and a second name associated with a second location;

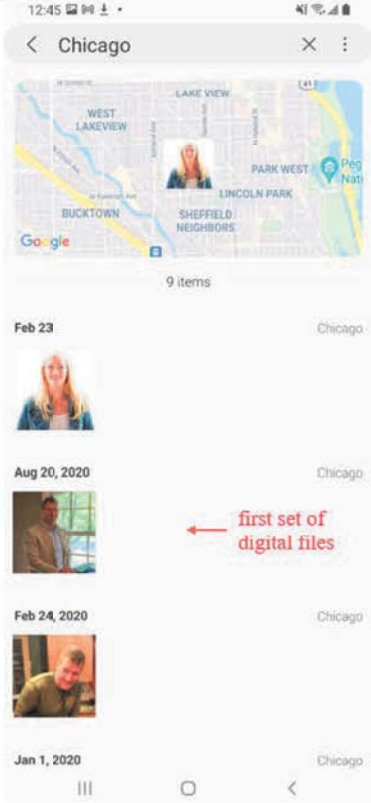


The locations view includes a first name associated with a first location, and a second name associated with a second location.

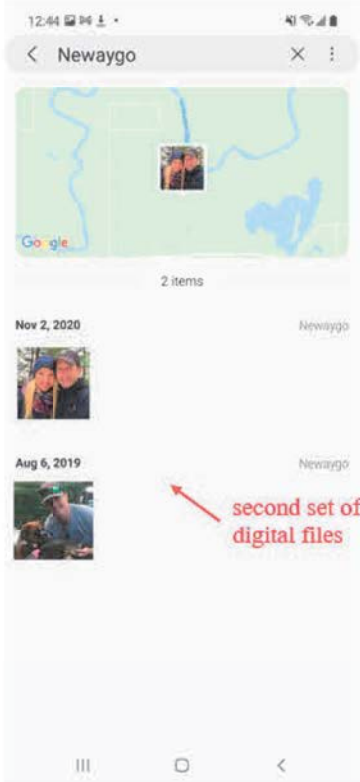
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| |  <p>The screenshot shows a mobile gallery search interface with a search bar at the top. Below the search bar, there are eight image thumbnails arranged in a 4x2 grid. Each thumbnail is labeled with a location name and a small number below it. The locations shown are: Algonquin (1), Chicago (0), Dijon (2), Franklin (2), Glen Ellyn (3), Köln (1), Napa (8), and Newaygo (2). Red arrows point from text annotations to the 'Chicago' and 'Newaygo' labels. The 'Chicago' label is annotated with 'first name associated with a first location', and the 'Newaygo' label is annotated with 'second name associated with a second location'.</p> |
| <p>1[h] responsive to an input that is indicative of a selection associated with the first location, causing a first set of digital files to be displayed on the</p> | <p>Responsive to an input that is indicative of a selection associated with the first location (e.g., clicking or tapping a first image in the locations view that is associated with the first location), Gallery causes a first set of digital files to be displayed on the interface, each digital file in the first set of digital files being associated with the first location.</p> |

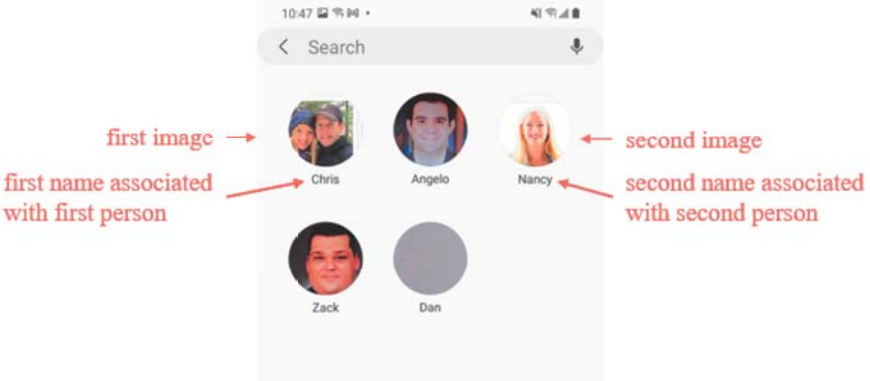
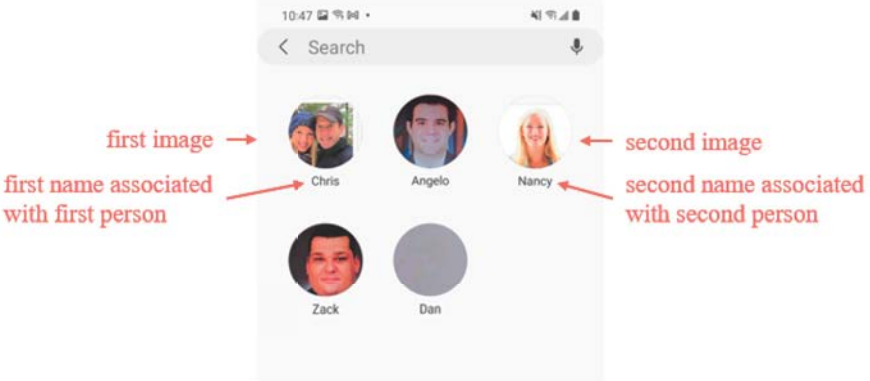
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| <p>interface, each digital file in the first set of digital files being associated with the first location; and</p> |  |
| <p>1[i] responsive to an input that is indicative of a selection associated with the second location, causing a second set of</p> | <p>Responsive to an input that is indicative of a selection associated with the second location (e.g., clicking or tapping a second image in the locations view that is associated with the second location), Gallery causes a second set of digital files to be displayed on the interface, each digital file in the second set of digital files being associated with the second location.</p> |

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| <p>digital files to be displayed on the interface, each digital file in the second set of digital files being associated with the second location.</p> |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:44 and the location is Newwaygo. Below the title bar is a map showing a location. Underneath the map, it says '2 items'. There are two photo thumbnails. The first is dated 'Nov 2, 2020' and the second is dated 'Aug 6, 2019'. A red arrow points to the second thumbnail with the text 'second set of digital files'.</p> |
| <p>2. The method of claim 1, wherein the people view further includes a first name associated</p> | <p>See information for claim 1. The people view includes a first name associated with the first person and a second name associated with the second person.</p> |

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| <p>with the first person and a second name associated with the second person.</p> |  <p>first image →</p> <p>first name associated with first person →</p> <p>second image ←</p> <p>second name associated with second person ←</p> |
| <p>3. The method of claim 2, wherein the first name associated with the first person is adjacent to the first image and the second name associated with the second person is adjacent to the second image.</p> | <p>See information for claim 2. The first name associated with the first person is adjacent to the first image and the second name associated with the second person is adjacent to the second image.</p>  <p>first image →</p> <p>first name associated with first person →</p> <p>second image ←</p> <p>second name associated with second person ←</p> |
| <p>4. The method of claim 3, wherein the first</p> | <p>See information for claim 3. The first person view includes the first name associated with the first person. Similarly, the second person view includes the second name associated with the second person.</p> |

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| <p>person view includes the first name associated with the first person and the second person view includes the second name associated with the second person.</p> | |
| <p>5[a] The method of claim 4, wherein the first image associated with the first person is a first thumbnail image and the first digital file associated with the first person is a first profile image associated with the first</p> | <p>See information for claim 4. The first image associated with the first person is a first thumbnail image and the first digital file associated with the first person is a first profile image, as shown below.</p> |

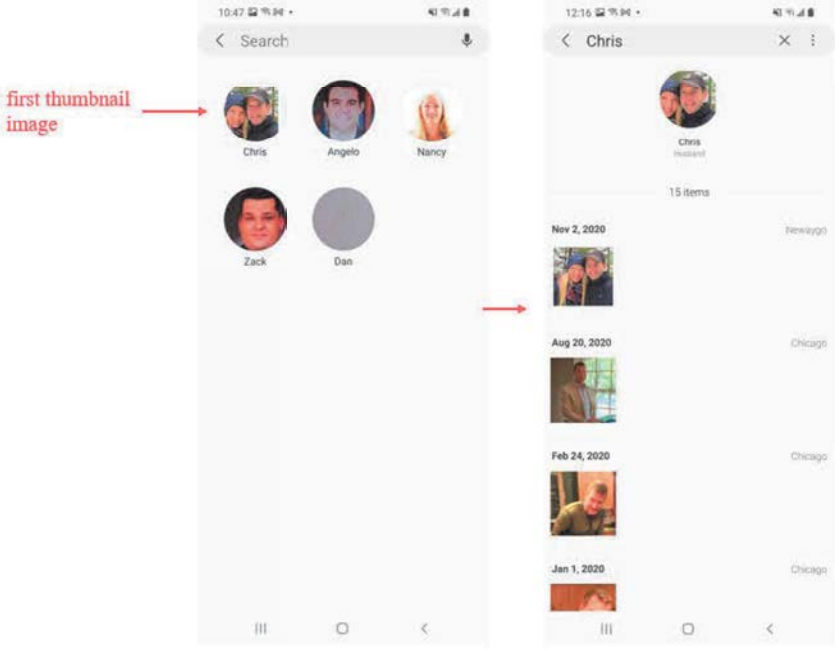
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| <p>person is a first profile image and</p> | |
| <p>5[b] wherein the second image associated with the second person is a second thumbnail image and the second digital file associated with the second person is a second profile image.</p> | <p>The second image associated with the second person is a second thumbnail image and the second digital file associated with the second person is a second profile image, as shown below.</p> |

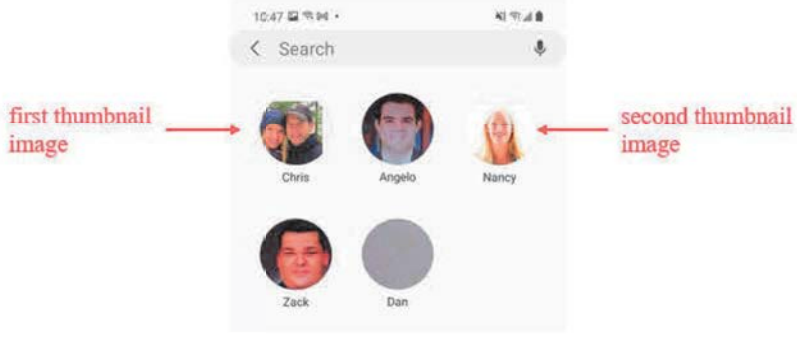
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| <p>6. The method of claim 5, wherein the input indicative of the selection associated with the first person is a click</p> | <p>See information for claim 5. The input indicative of the selection associated with the first person is a click or tap of the first thumbnail image associated with the first person.</p> |

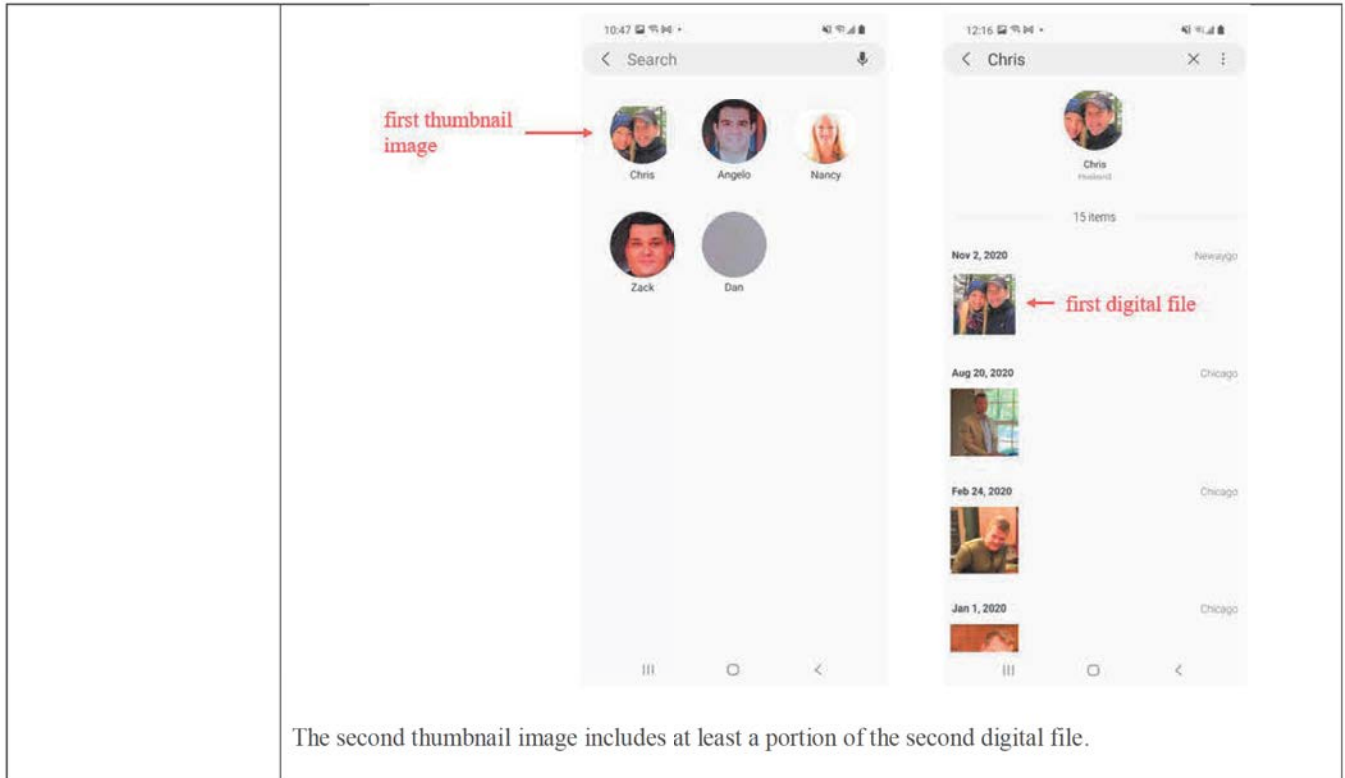
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| <p>or tap of the first thumbnail image associated with the first person.</p> |  |
| <p>7. The method of claim 5, wherein the first thumbnail image associated with the first person includes a face of the first person and the second thumbnail image associated with the second person includes a</p> | <p><i>See</i> information for claim 5. The first thumbnail image associated with the first person includes a face of the first person. Similarly, the second thumbnail image associated with the second person includes a face of the second person.</p> |

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| <p>face of the second person.</p> |  |
| <p>8. The method of claim 7, wherein the first thumbnail image includes at least a portion of the first digital file and the second thumbnail image includes at least a portion of the second digital file.</p> | <p><i>See information for claim 7. The first thumbnail image includes at least a portion of the first digital file.</i></p> |


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| <p>9[pre] The method of claim 5, wherein</p> | <p><i>See</i> information for claim 5.</p> |
| <p>9[a] the first information in the first detail view includes the first name</p> | <p>The first information in the first detail view includes the first name associated with the first person.</p> |

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| <p>associated with the first person and</p> |  <p>12:00 Nov 2, 2020 12:00 AM</p> <p>122375435_18189148788378478_4122940921846917285_A 396 445 52 KB 3256x1104 Internal storage/Pictures</p> <p>People</p> <p>Chris Nancy</p> <p>Location</p> <p>7575 Little Dr, Newaygo, MI 49337, USA</p> <p>first information →</p> <p>first name associated with first person →</p> |
| <p>9[b] the second information in the second detail view includes the second name associated with the second person.</p> | <p>The second information in the second detail view includes the second name associated with the second person.</p> |

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| |  <p>second information →</p> <p>second name associated with second person →</p> |
| <p>10[a] The method of claim 9, wherein the first information includes a first date associated with the first digital file and</p> | <p>See information for claim 9. The first information includes a first date associated with the first digital file.</p> |

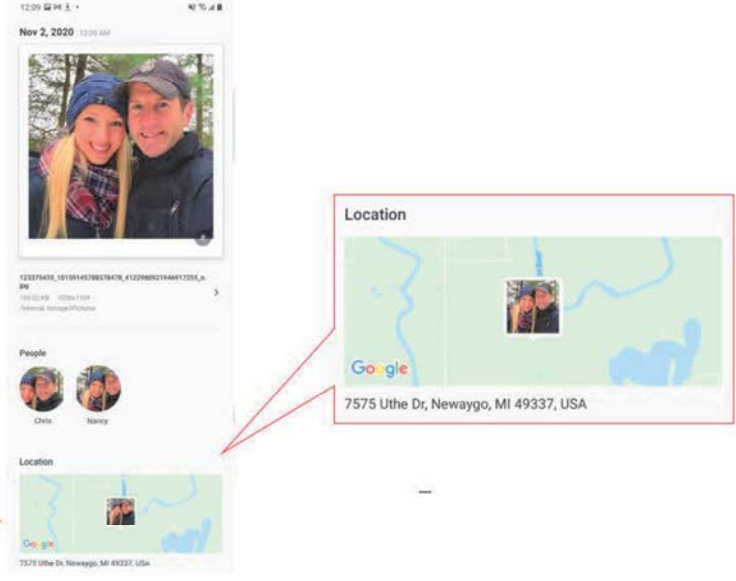
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| <p>10[b] the second information includes a second date associated with the second digital file.</p> | <p>The second information includes a second date associated with the second digital file.</p> |

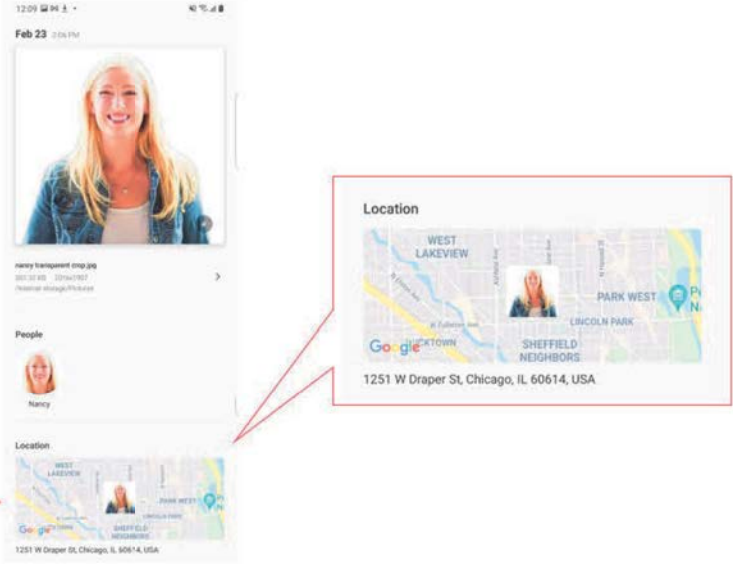
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| <p>11[a] The method of claim 10, wherein the first map image in the first detail view is indicative of a first geographic location associated with the first digital file and</p> | <p><i>See</i> information for claim 10. The first map image in the first detail view is indicative of a first geographic location associated with the first digital file.</p> |

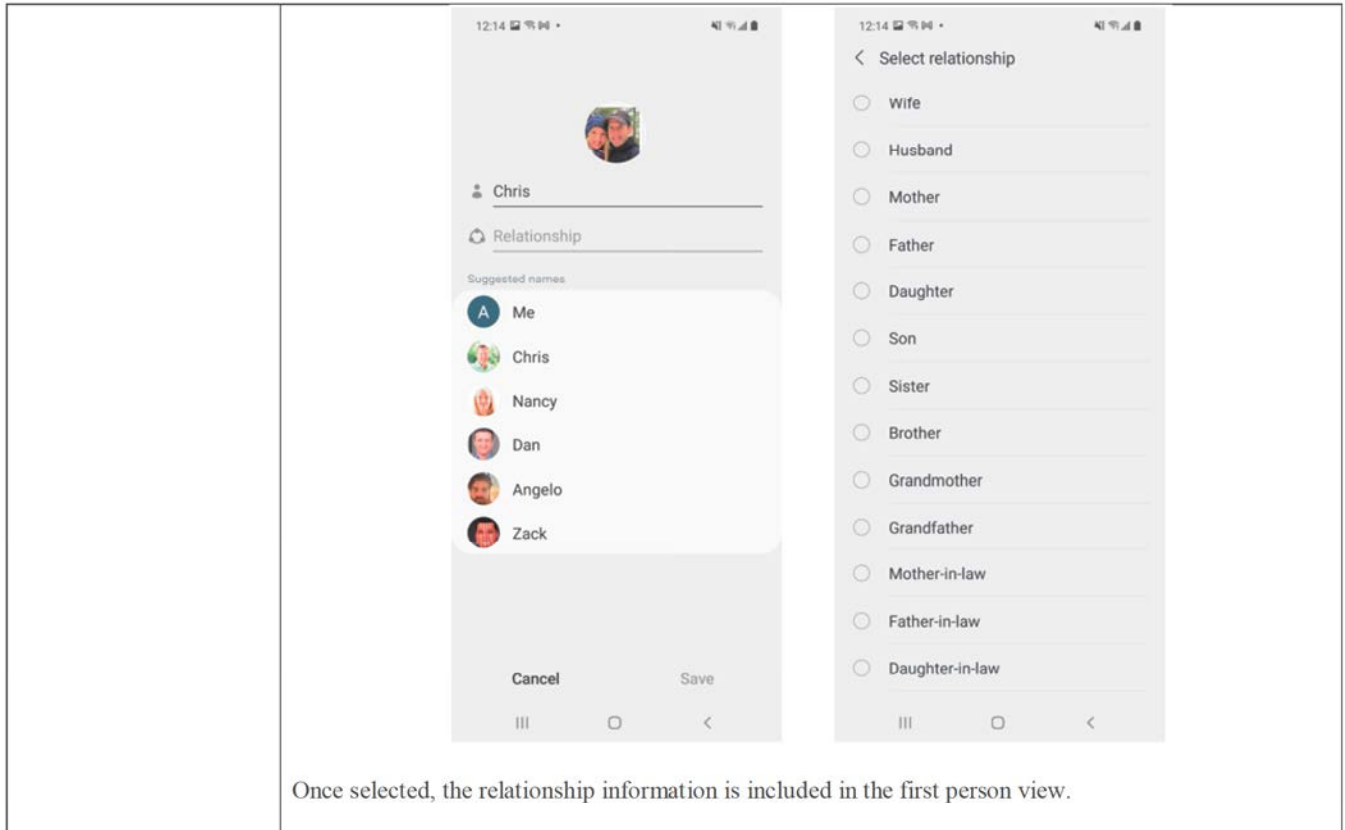
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| |  <p>The screenshot shows a mobile gallery interface. At the top, it displays the date 'Nov 2, 2020' and the time '12:00 AM'. Below this is a photo of a man and a woman. Underneath the photo is a metadata section with a file name, size, and resolution. A 'People' section shows two profile pictures labeled 'Chris' and 'Nancy'. At the bottom, there is a 'Location' section with a small map thumbnail. A red arrow labeled 'first map image' points to this thumbnail. A red-bordered callout box provides a larger view of the map, showing the photo thumbnail overlaid on a map of a lake area, with the address '7575 Utthe Dr, Newaygo, MI 49337, USA' displayed below the map.</p> |
| <p>11[b] the second map image in the second detail view is indicative of a second geographic location associated with the second digital file.</p> | <p>The second map image in the second detail view is indicative of a second geographic location associated with the second digital file.</p> |

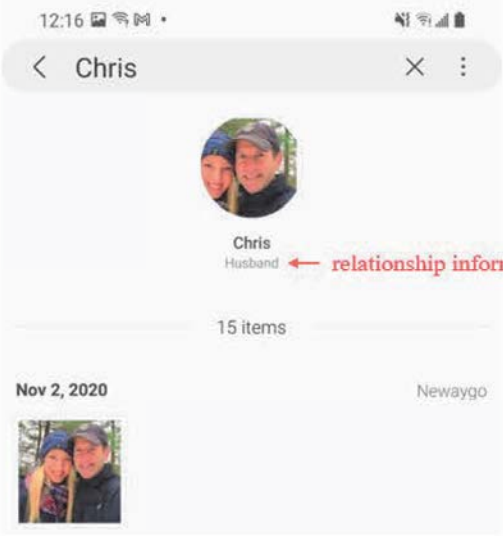
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| |  <p>The screenshot shows a mobile gallery interface. At the top, there's a photo of a woman with blonde hair. Below it, a contact card for 'Nancy' is visible. Underneath, a 'Location' section displays a map of Chicago with a red pin and the address '1251 W Draper St, Chicago, IL 60614, USA'. A red box highlights this map, and a red arrow points from it to a larger, more detailed version of the same map labeled 'second map image'.</p> |
| <p>12. The method of claim 4, wherein the first person view further includes relationship information associated with the first person and another person.</p> | <p><i>See</i> information for claim 4. The first person view further includes relationship information associated with the first person and another person. Gallery allows a user to specify a relationship for each person in the people view.</p> |


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| <p>13. The method of claim 12, wherein the relationship information is indicative of a family relationship between the first person and the another person.</p> | <p><i>See</i> information for claim 12. The relationship information is indicative of a family relationship between the first person and the another person. As shown below, the family relationship can be wife, husband, mother, father, daughter, son, sister, brother, grandmother, grandfather, mother-in-law, father-in-law, daughter-in-law, or son-in-law.</p> |

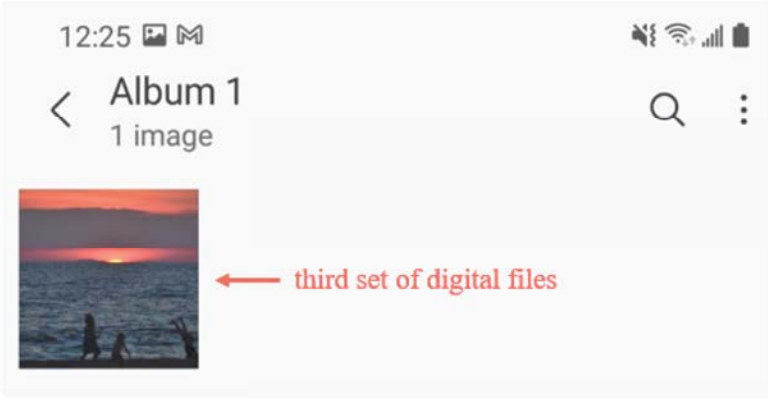
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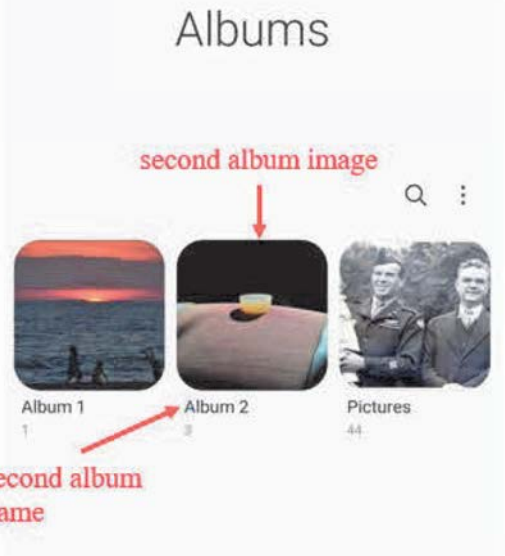
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| <p>14. The method of claim 13, wherein the another person is the user of the interface.</p> | <p><i>See</i> information for claim 13. In at least some examples, the another person is the user of the interface.</p> |
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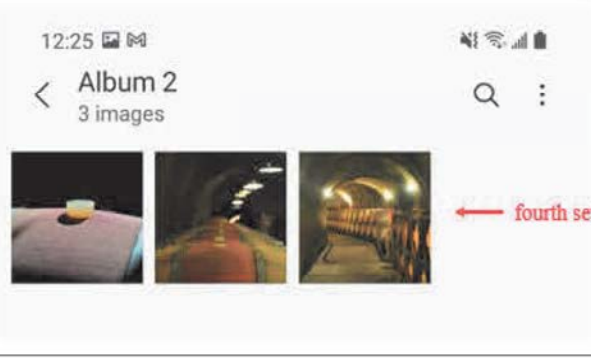
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| <p>15<pre></pre> The method of claim 1, further comprising:</p> | <p>See information for claim 1.</p> |
| <p>15[a] causing the interface to display an albums view, the albums view including a first album image and a first album name associated with a first album, the first album including a third set of digital files; and</p> | <p>Gallery causes the interface to display an albums view, which includes a first album image and a first album name associated with a first album. As shown below for limitation 15[b], the first album includes a third set of digital files.</p>  |
| <p>15[b] responsive to an input that is indicative of</p> | <p>Responsive to an input that is indicative of a selection associated with the first album, Gallery causes the third set of digital files to be displayed on the interface.</p> |

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| <p>a selection associated with the first album, causing the third set of digital files to be displayed on the interface.</p> |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:25. Below the time is a back arrow, the album name 'Album 1', and '1 image'. To the right are search and menu icons. A single image of a sunset over water is displayed. A red arrow points to this image with the text 'third set of digital files'.</p> |
| <p>16[pre] The method of claim 15,</p> | <p>See information for claim 15.</p> |
| <p>16[a] wherein the albums view includes a second album image and a second album name associated with a second album, the second album including a fourth set of digital files, the method further comprising</p> | <p>The albums view includes a second album image and a second album name associated with a second album, the second album including a fourth set of digital files.</p> |

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| |  <p>The screenshot shows a mobile gallery interface with the title "Albums" at the top. Below the title are three album thumbnails. The first thumbnail is labeled "Album 1" and shows a sunset over water. The second thumbnail is labeled "Album 2" and shows a bowl of fruit. The third thumbnail is labeled "Pictures" and shows two men. A red arrow points from the text "second album image" to the top of the "Album 2" thumbnail. Another red arrow points from the text "second album name" to the label "Album 2" below the thumbnail. There are also search and menu icons in the top right corner.</p> |
| <p>16[b] responsive to an input that is indicative of a selection associated with the second album, causing the fourth set of digital files to be displayed on the interface.</p> | <p>Responsive to an input that is indicative of a selection associated with the second album, Gallery causes the fourth set of digital files to be displayed on the interface.</p> |

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| |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:25. Below the time, there is a back arrow, the album name 'Album 2', and '3 images'. To the right, there are search and menu icons. Below the text, three image thumbnails are displayed. A red arrow points to the third thumbnail, which is labeled 'fourth set of digital files'.</p> |
| <p>17. The method of claim 16, wherein the first album name is displayed adjacent to the first album image in the albums view and the second album name is displayed adjacent to the second album image in the albums view.</p> | <p><i>See</i> information for claim 16. The first album name is displayed adjacent to the first album image in the albums view (<i>see</i> information for limitation 15[a]) and the second album name is displayed adjacent to the second album image in the albums view (<i>see</i> information for limitation 16[a]).</p> |
| <p>18[pre] The method of claim 17, further comprising:</p> | <p><i>See</i> information for claim 17.</p> |
| <p>18[a] prior to causing the albums view to be displayed on the interface, receiving first alphanumeric text as the first album name;</p> | <p>Prior to causing the albums view to be displayed on the interface, Gallery receives first alphanumeric text as the first album name.</p> |

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| <p>18[b] receiving an input indicative of a desire to associate the third set of digital files with the first album name; and</p> | <p>Gallery also receives an input indicative of a desire to associate the third set of digital files with the first album name, as shown below.</p> |

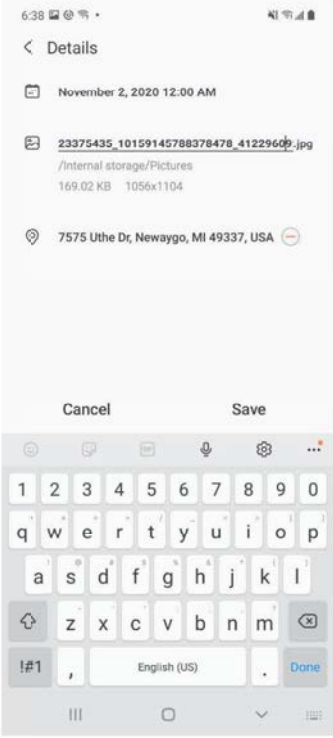
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| <p>18[c] causing the third set of digital files to be</p> | <p>Gallery also causes the third set of digital files to be associated with the first album.</p> |

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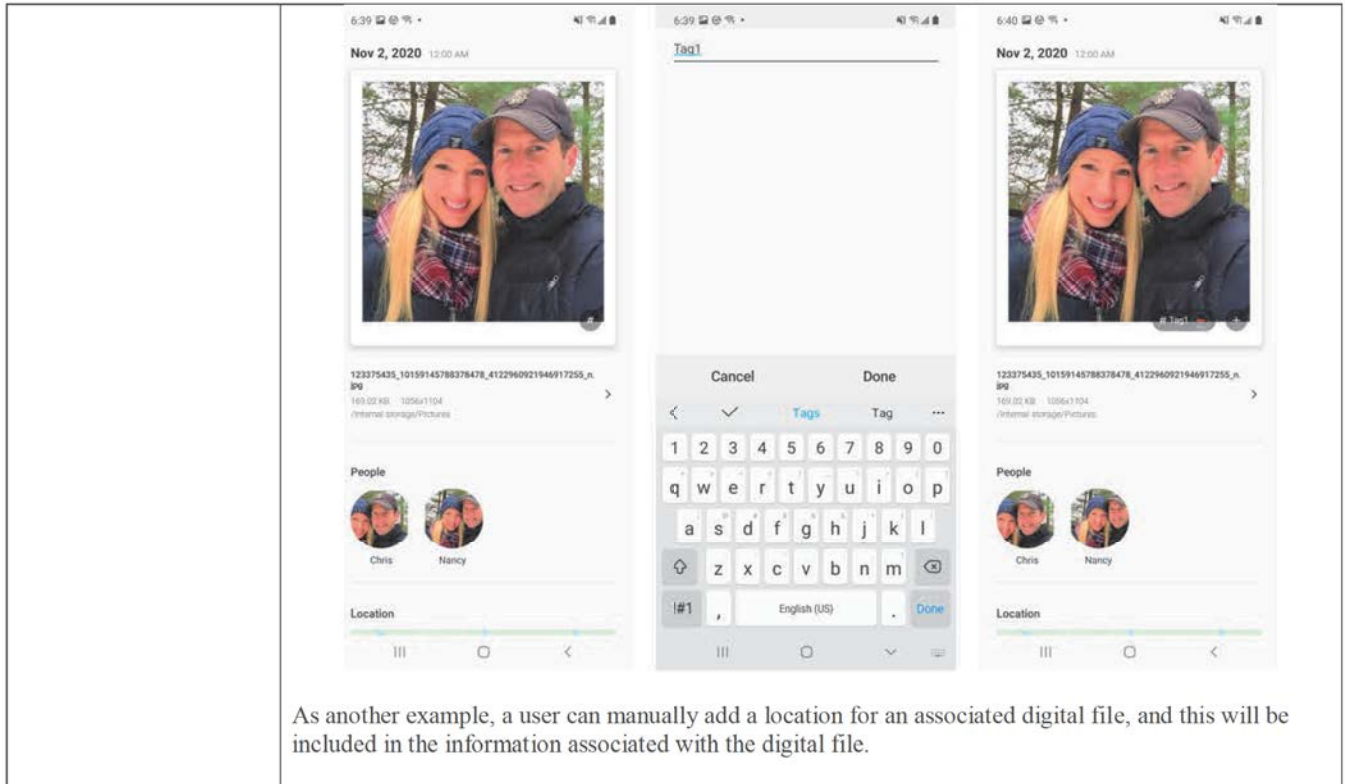
| | |
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| <p>associated with the first album.</p> |  <p>12:25 [notification icons] [status icons]</p> <p>< Album 1 1 image</p> <p>Q ⋮</p> <p>← third set of digital files</p> |
| <p>19. The method of claim 1, wherein a first portion of the first information is generated by a user and wherein a first portion of the second information is generated by the user.</p> | <p>A first portion of the first information can be generated by a user. For example, a user can edit the name of the associated digital file.</p> |

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| |  <p>6:38</p> <p>< Details</p> <p>November 2, 2020 12:00 AM</p> <p>23375435_10159145788378478_412296dp.jpg /internal storage/Pictures 169.02 KB 1056x1104</p> <p>7575 Utthe Dr, Newaygo, MI 49337, USA</p> <p>Cancel Save</p> <p>1 2 3 4 5 6 7 8 9 0 q w e r t y u i o p a s d f g h j k l z x c v b n m English (US) Done</p> |
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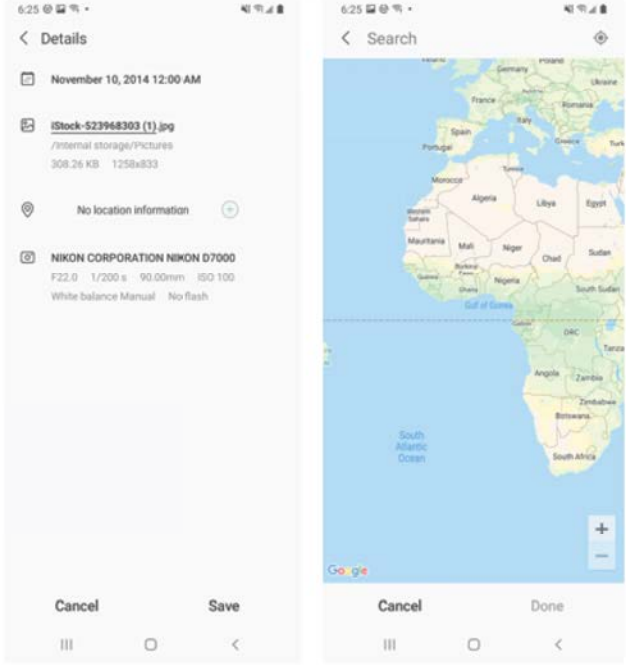
As another example, a user can manually tag the associated digital file, and the tag will be included in the information associated with the digital file.

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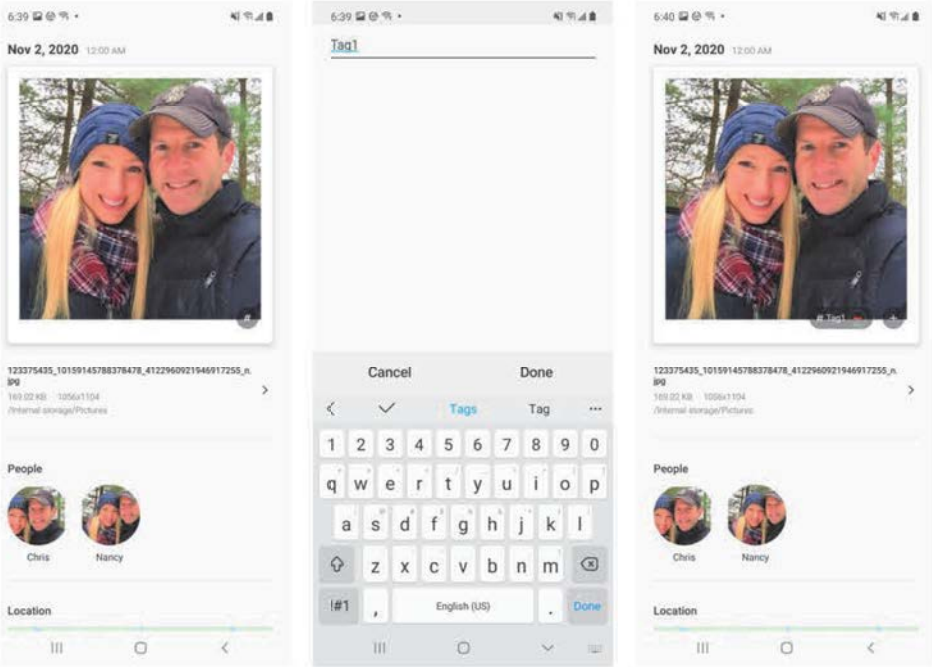


As another example, a user can manually add a location for an associated digital file, and this will be included in the information associated with the digital file.

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| <p>20. The method of claim 19, wherein a second portion of the first information is automatically generated and wherein a second portion of the second information is automatically generated.</p> | <p><i>See</i> information for claim 19. A second portion of the first information is automatically generated and a second portion of the second information is automatically generated. For example, the date/time, the file name, and camera/device information are automatically generated. In at least some examples, the location information is automatically generated.</p> |

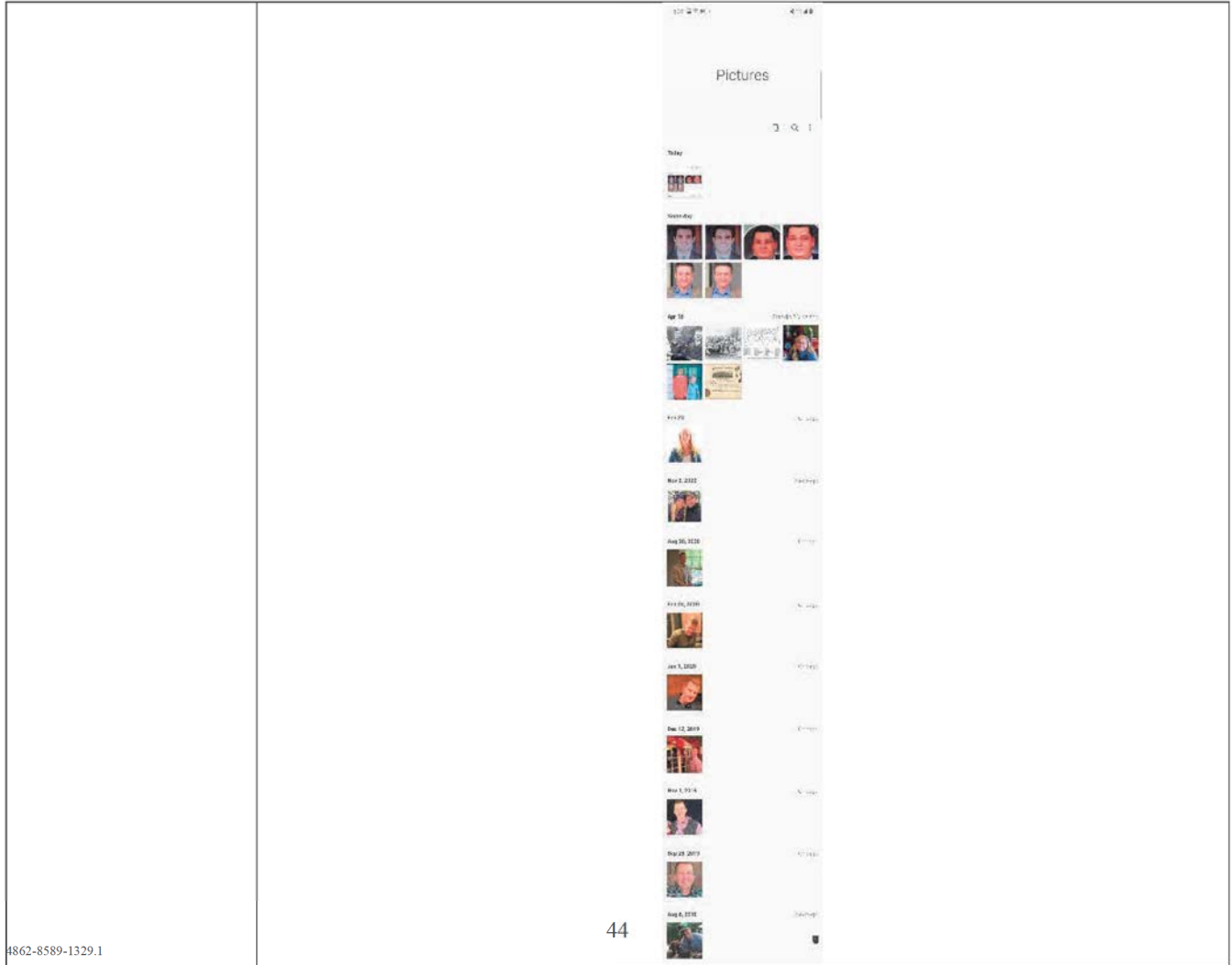
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| <p>21. The method of claim 20, wherein the second portion of the first information includes first tag information and wherein the second portion of the second information includes second tag information.</p> | <p><i>See</i> information for claim 20. The second portion of the first information can include first tag information and the second portion of the second information can include second tag information. As discussed above, a user can manually tag a digital file, and the tag will be included in the information associated with that digital file.</p>  <p>The figure consists of three screenshots from a mobile gallery application. The left screenshot shows a photo of a man and a woman taken on Nov 2, 2020 at 12:00 AM. Below the photo, there is a file name, size (163.02 KB), resolution (1056x1104), and a 'People' section with circular icons for 'Chris' and 'Nancy'. The middle screenshot shows a keyboard with a 'Tag' field at the top containing the text 'Tag1'. The right screenshot is identical to the left one, showing the same photo and tagging options.</p> |
| <p>22. The method of claim 21, further comprising</p> | <p><i>See</i> information for claim 21. Gallery causes a gallery view to be displayed on the interface, which includes a plurality of digital files.</p> |

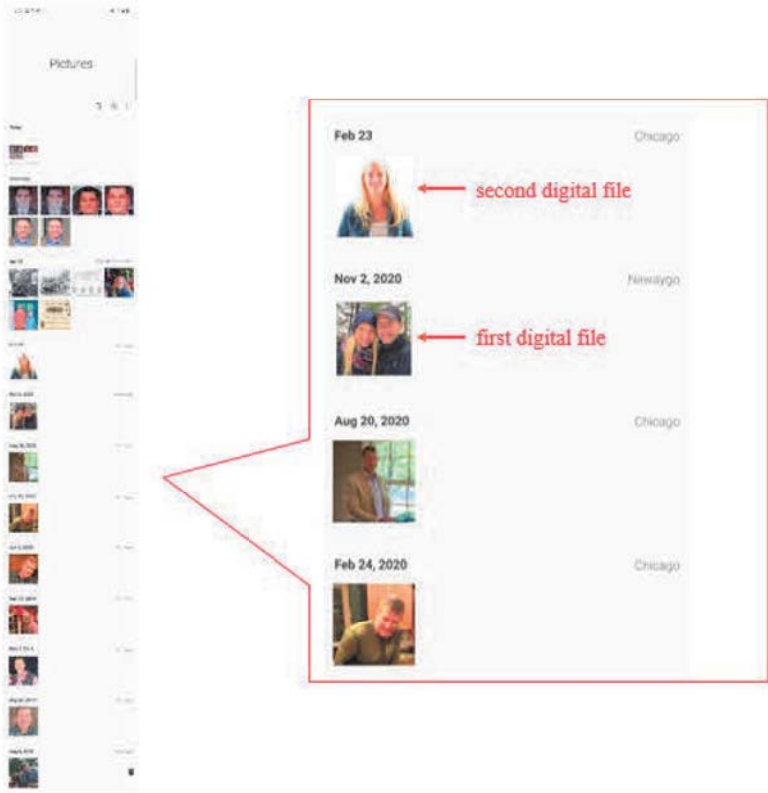
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| causing a gallery view to be displayed on the interface, the gallery view including a plurality of digital files. | |
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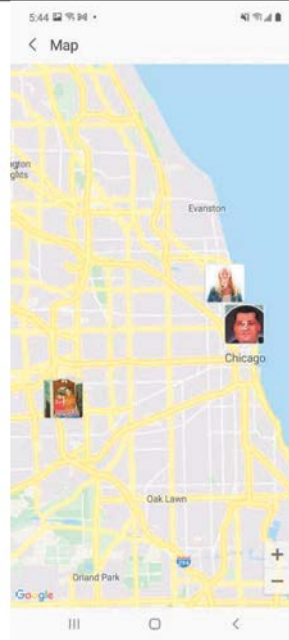
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

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| <p>23. The method of claim 22, wherein the plurality of digital files includes the first digital file, the second digital file, the first set of digital files, and the second set of digital files.</p> | <p>See information for claim 22. The plurality of digital files includes the first digital file, the second digital file, the first set of digital files, and the second set of digital files.</p>  <p>The image shows a screenshot of a mobile gallery application. On the left, a vertical list of photo thumbnails is visible. On the right, a larger view of a photo album is shown, with a red box highlighting a specific section. Within this red box, four photos are listed with their dates and locations: Feb 23 (Chicago), Nov 2, 2020 (Newrygo), Aug 20, 2020 (Chicago), and Feb 24, 2020 (Chicago). Red arrows point from the text labels 'second digital file' and 'first digital file' to the photos from Feb 23 and Nov 2, 2020, respectively.</p> |
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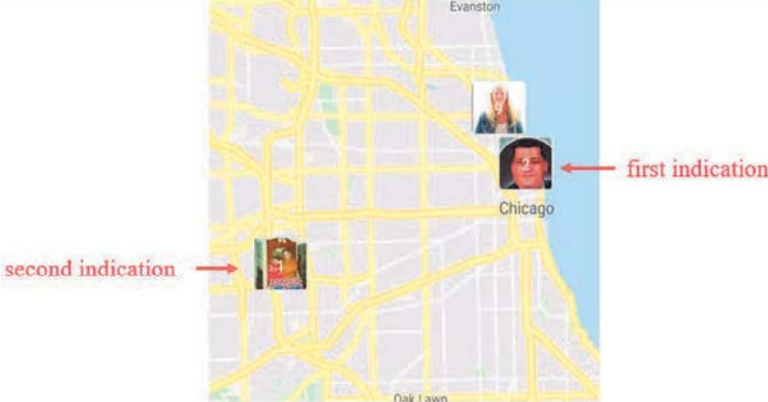
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| <p>24. The method of claim 1, wherein the interface is a computer display, a smartphone display, or a tablet display.</p> | <p><i>See</i> information for claim 1. The Gallery application runs on Samsung smartphones (an interface), such as the Galaxy A51 smartphone. The Gallery application also runs on Samsung tablets (an interface), such as the Galaxy Tab A7.</p> |
| <p>25. The method of claim 1, subsequent to causing the interface to display the search filter view, causing the interface to display a map view including (i) an interactive geographic map, (ii) a first indication on the interactive map that is associated with one or more digital files, and (iii) a second indication on the interactive map that is associated with one or more digital files.</p> | <p><i>See</i> information for claim 1. Subsequent to causing the interface to display the search filter view, Gallery causes the interface to display a map view including an interactive geographic map. The geographic map is interactive at least because Gallery permits zooming in/out and moving around the map.</p> |

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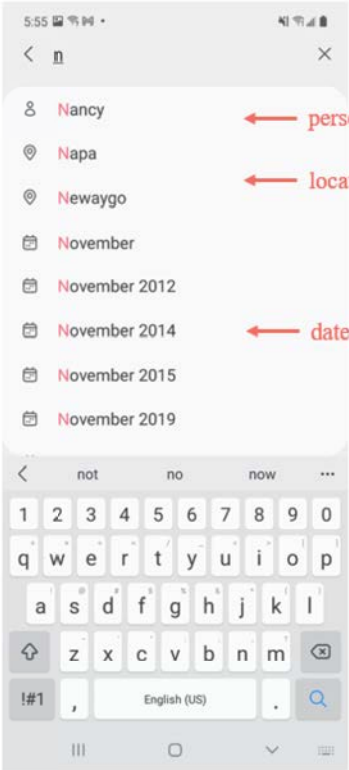
The map view includes a first indication on the interactive map that is associated with one or more digital files and a second indication on the interactive map that is associated with one or more digital files.

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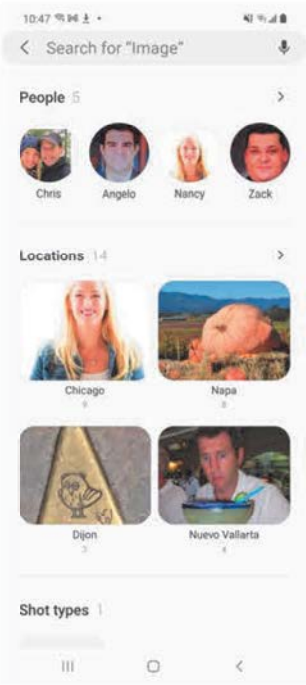
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| <p>26. The method of claim 25, wherein the first indication on the interactive geographic map is a third image and the second indication on the interactive geographic map is a fourth image.</p> | <p><i>See</i> information for claim 25. The first indication on the interactive geographic map is a third image and the second indication on the interactive geographic map is a fourth image.</p>  |

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| <p>27. The method of claim 1, further comprising, responsive to receiving a first one of the one or more criteria within the search-filter view, causing one or more digital files to be displayed on the interface based at least in part on the received first one of the one or more criteria.</p> | <p><i>See</i> information for claim 1. Responsive to receiving a first one of the one or more criteria within the search-filter view, Gallery causes one or more digital files to be displayed on the interface based at least in part on the received first one of the one or more criteria. For example, Gallery can receive “October” as a first one of the one or more criteria and cause one or more digital files associated with a October date to be displayed.</p>  <p>The screenshot shows a mobile gallery interface with a search filter set to 'October'. It displays two items: a photo from October 28, 2018, in Chicago, and a photo from October 7, 2010, in Wyoming.</p> |
| <p>28. The method of claim 27, wherein the one or more criteria include a keyword, a location, a person, an event, a date, or any combination thereof.</p> | <p><i>See</i> information for claim 27. The one or more criteria can include a keyword, a location, a person, an event, a date, or any combination thereof. Gallery also automatically suggests one or more search criteria, as shown below.</p> |

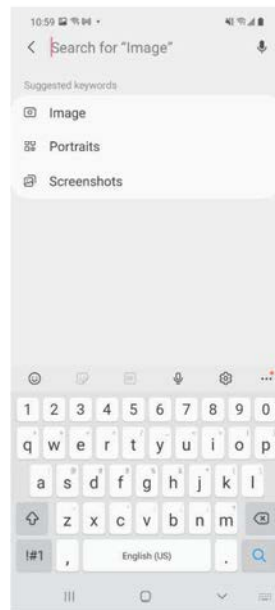
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| <p>29[pre] A digital file storage system comprising:</p> | <p>To the extent the preamble is limiting, Samsung devices (e.g., smartphones and tablets) that run the Gallery application are a digital file storage system.</p> |
| <p>29[a] a non-transitory computer-readable</p> | <p>Samsung devices running the Gallery application include a non-transitory computer-readable storage medium storing a plurality of digital files and instructions. For example, the Samsung Galaxy A51</p> |

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| <p>storage medium storing a plurality of digital files and instructions; and</p> | <p>includes 128 GB of internal memory and 105.5 GB of available memory. <i>See, e.g.,</i> https://www.samsung.com/us/mobile/galaxy-a51/.</p> |
| <p>29[b] one or more processors configured to execute the instructions to:</p> | <p>Samsung devices running the Gallery application include one or more processors configured to execute the instructions. For example, the Samsung Galaxy A51 includes an Octa-Core processor. <i>See, e.g.,</i> https://www.samsung.com/us/mobile/galaxy-a51/.</p> |
| <p>29[c] cause an interface to display a search-filter view, the search-filter view permitting a user to filter the plurality of digital files based on one or more criteria;</p> | <p>Gallery causes an interface to display a search-filter view, the search-filter view permitting a user to filter the plurality of digital files based on one or more criteria.</p>  <p>The screenshot shows a mobile interface for searching images. At the top, it says 'Search for "Image"'. Below this, there are three filter categories: 'People' with 5 items, 'Locations' with 14 items, and 'Shot types'. Under 'People', there are four circular profile pictures labeled Chris, Angelo, Nancy, and Zack. Under 'Locations', there are four square thumbnails labeled Chicago, Napa, Dijon, and Nuevo Vallarta. At the bottom, there is a 'Shot types' section which is currently empty. The interface is clean and modern, with a white background and subtle shadows.</p> |

The search-filter view permits a user to filter a plurality of digital files based on one or more criteria, for example, by entering text into the search box. Gallery also suggests search keywords, such as “Image,” “Portraits,” and “Screenshots.”

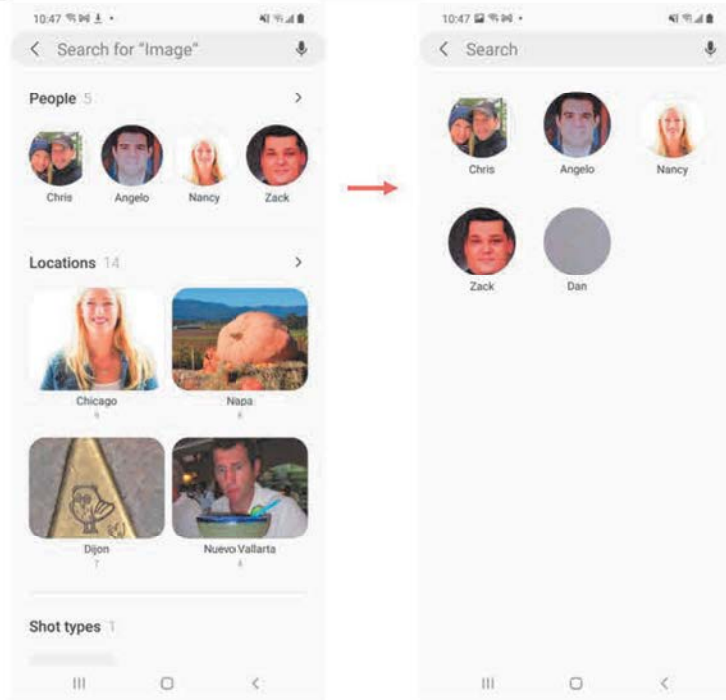


29[d] responsive to a first input within the search-filter view, cause the interface to display a people view including a first image associated with a first person and a

Responsive to a first input within the search-filter view, Gallery causes the interface to display a people view including a first image associated with a first person and a second image associated with a second person.

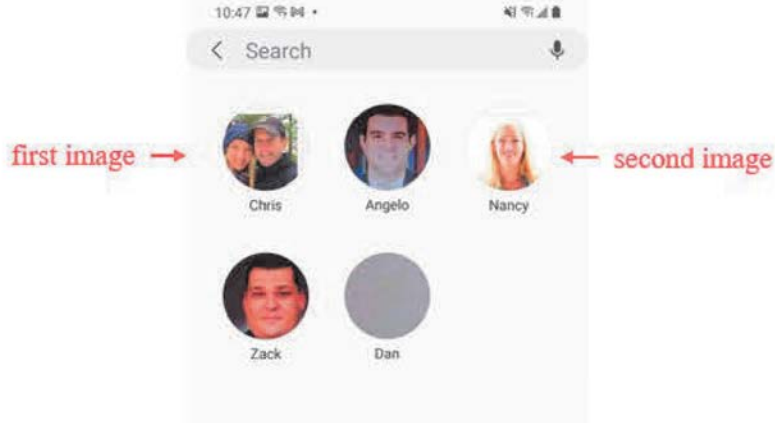
Initial Infringement Contentions – U.S. Patent No. 11,163,823 – Samsung Gallery

second image associated with a second person;

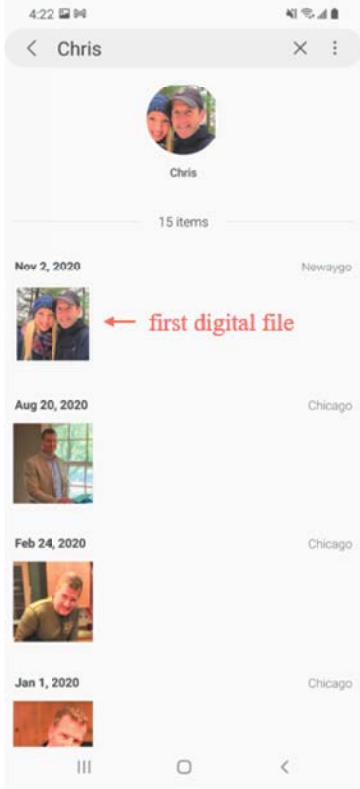


The people view includes a first image associated with a first person and a second image associated with a second person.

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| <p>29[e] responsive to an input that is indicative of a selection associated with the first person, cause a first person view to be displayed on the interface, the first person view including a first digital file associated with the first person;</p> | <p>Responsive to an input that is indicative of a selection associated with the first person, Gallery causes a first person view to be displayed on the interface, the first person view including a first digital file associated with the first person.</p> |

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| <p>29[f] responsive to an input that is indicative of a selection associated with the first digital file, cause a first detail view</p> | <p>Responsive to an input that is indicative of a selection associated with the first digital file, Gallery causes a first detail view to be displayed on the interface, the first detail view including (i) the first digital file, (ii) first information associated with the first digital file and (iii) a first map image associated with the first digital file.</p> |

to be displayed on the interface, the first detail view including (i) the first digital file, (ii) first information associated with the first digital file and (iii) a first map image associated with the first digital file,

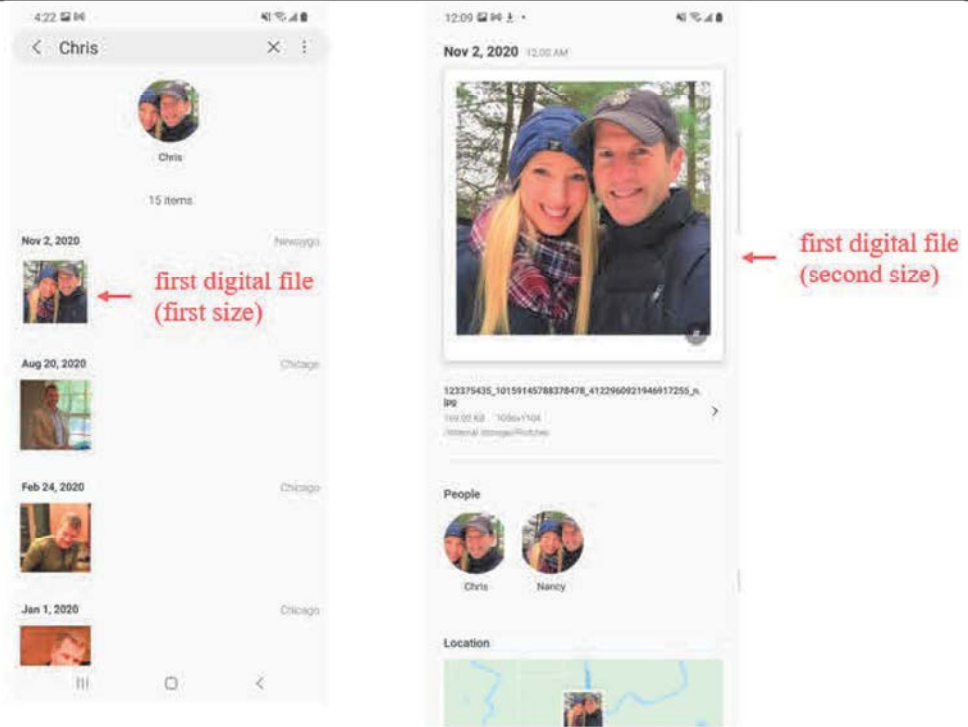


29[g] the first digital file having a first size in the first person view and a second size in the first

The first digital file has a first size in the first person view and a second size in the first detail view, wherein the second size is greater than the first size.

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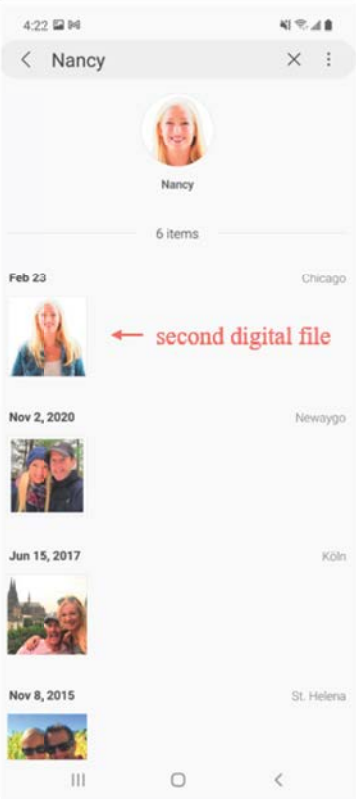
detail view, wherein the second size is greater than the first size;




29[h] responsive to an input that is indicative of a selection associated with the second person, cause a second person view to be displayed on the interface, the second person view including a

Responsive to an input that is indicative of a selection associated with the second person, Gallery causes a second person view to be displayed on the interface, the second person view including a second digital file associated with the second person.

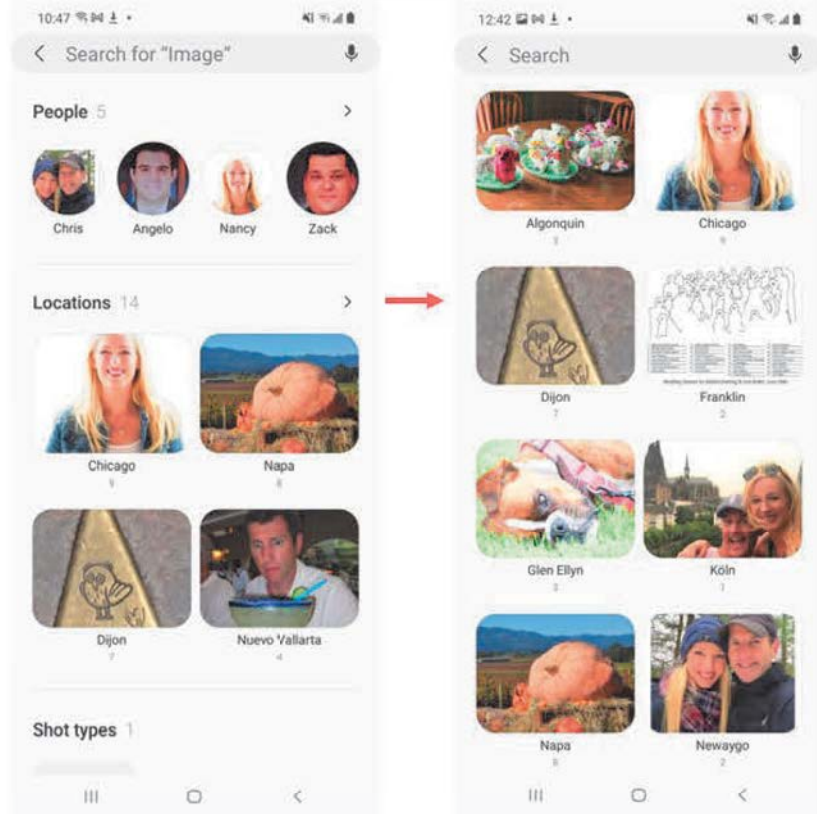
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| <p>second digital file associated with the second person;</p> |  |
| <p>29[i] responsive to an input that is indicative of a selection associated with the second digital file, cause a second</p> | <p>Responsive to an input that is indicative of a selection associated with the second digital file, Gallery causes a second detail view to be displayed on the interface, the second detail view including (i) the second digital file, (ii) second information associated with the second digital file and (iii) a second map image associated with the second digital file.</p> |

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| <p>detail view to be displayed on the interface, the second detail view including (i) the second digital file, (ii) second information associated with the second digital file and (iii) a second map image associated with the second digital file; and</p> |  <p>The screenshot shows a mobile gallery interface. At the top, it displays the time '12:09' and the date 'Feb 23 2:56 PM'. Below this is a large photo of a woman with blonde hair wearing a denim jacket. To the right of the photo is a red arrow pointing to it with the text 'second digital file'. Below the photo is a section titled 'nancy transparent crop.jpg' with file details '391.32 KB 2016x1907 /Internal storage/Pictures'. To the right of this section is a red arrow pointing to it with the text 'second information'. Below this is a 'People' section with a small profile picture and the name 'Nancy'. Below that is a 'Location' section with a map showing a location in Chicago. To the right of the map is a red arrow pointing to it with the text 'second map image'. The map shows '1251 W Draper St, Chicago, IL 60614, USA'.</p> |
| <p>29[j] responsive to a second input within the search-filter view, cause the interface to display a locations view including a first name associated with a first location, and</p> | <p>Responsive to a second input within the search-filter view, Gallery causes the interface to display a locations view.</p> |


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a second name associated with a second location;

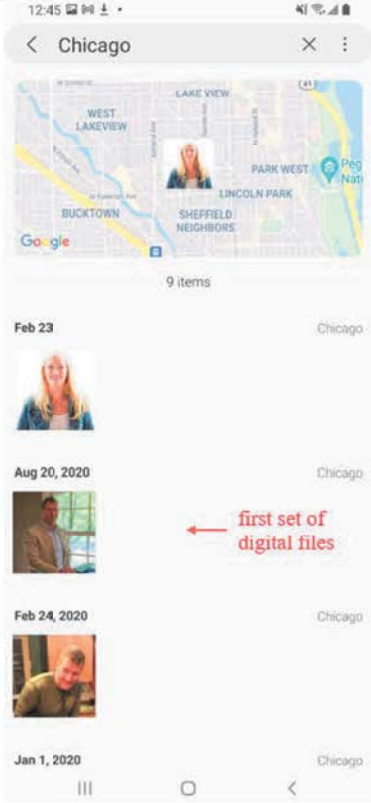


The locations view includes a first name associated with a first location, and a second name associated with a second location.

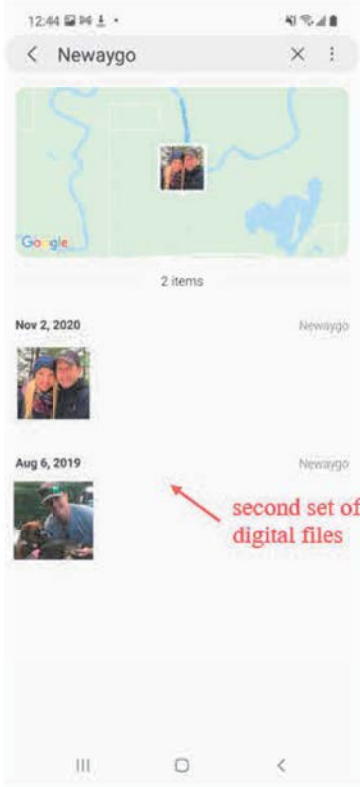
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| |  <p>12:42</p> <p>< Search</p> <p>Algonquin</p> <p>Chicago</p> <p>Dijon</p> <p>Franklin</p> <p>Glen Ellyn</p> <p>Köln</p> <p>Napa</p> <p>Newaygo</p> <p>first name associated with a first location</p> <p>second name associated with a second location</p> |
| <p>29 k responsive to an input that is indicative of a selection associated with the first location, cause a first set of digital files to be displayed on the interface, each digital</p> | <p>Responsive to an input that is indicative of a selection associated with the first location (e.g., clicking or tapping a first image in the locations view), Gallery causes a first set of digital files to be displayed on the interface, each digital file in the first set of digital files being associated with the first location.</p> |

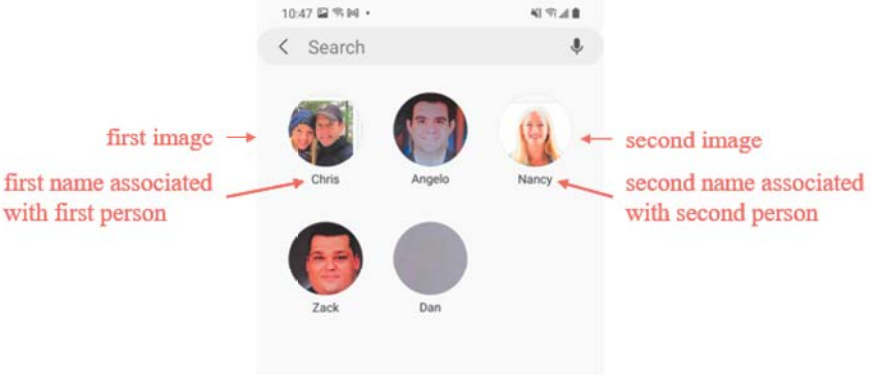
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| <p>file in the first set of digital files being associated with the first location; and</p> |  |
| <p>29 responsive to an input that is indicative of a selection associated with the second location, cause a second set of</p> | <p>Responsive to an input that is indicative of a selection associated with the second location (e.g., clicking or tapping a second image in the locations view), Gallery causes a second set of digital files to be displayed on the interface, each digital file in the second set of digital files being associated with the second location.</p> |

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| <p>digital files to be displayed on the interface, each digital file in the second set of digital files being associated with the second location.</p> |  <p>The screenshot shows a mobile gallery interface. At the top, the time is 12:44 and the location is Newygo. Below the title is a map with a photo thumbnail. Underneath, it says '2 items'. The first item is dated 'Nov 2, 2020' and shows two people. The second item is dated 'Aug 6, 2019' and shows a person in a hat. A red arrow points to the 'Aug 6, 2019' item with the text 'second set of digital files'.</p> |
| <p>30[pre] The digital file storage system of claim 29, wherein</p> | <p>See information for claim 29.</p> |
| <p>30[a] the people view further includes a first</p> | <p>The people view further includes a first name associated with the first person and a second name associated with the second person.</p> |

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| <p>name associated with the first person and a second name associated with the second person,</p> |  <p>The screenshot shows a mobile gallery search interface. At the top, there is a search bar with a back arrow and a microphone icon. Below the search bar, five person cards are displayed in a grid. The first row contains three cards: Chris, Angelo, and Nancy. The second row contains two cards: Zack and Dan. Red arrows point to the first card (Chris) and the third card (Nancy). Labels for the arrows are: 'first image' points to the image of Chris; 'first name associated with first person' points to the name 'Chris'; 'second image' points to the image of Nancy; and 'second name associated with second person' points to the name 'Nancy'.</p> |
| <p>30[b] the first person view includes the first name associated with the first person, and the second person view includes the second name associated with the second person.</p> | <p>The first person view includes the first name associated with the first person. The second person view includes the second name associated with the second person.</p> |

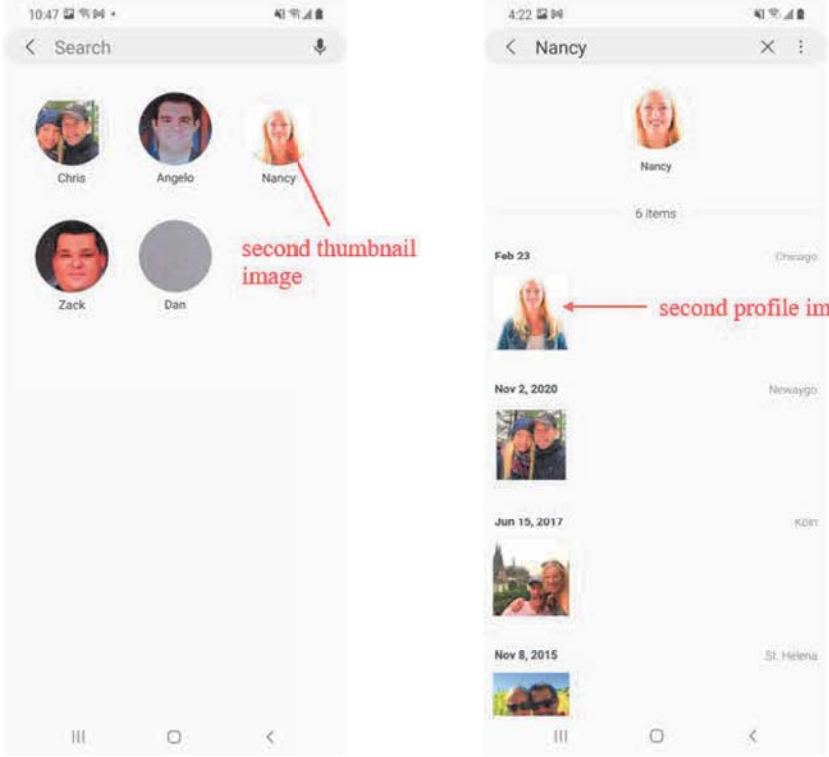
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| <p>31[pre] The digital file storage system of claim 30, wherein</p> | <p><i>See information for claim 30.</i></p> |
| <p>31[a] the first image associated with the first person is a first thumbnail image and the first digital file associated with the first</p> | <p>The first image associated with the first person is a first thumbnail image and the first digital file associated with the first person is a first profile image.</p> |

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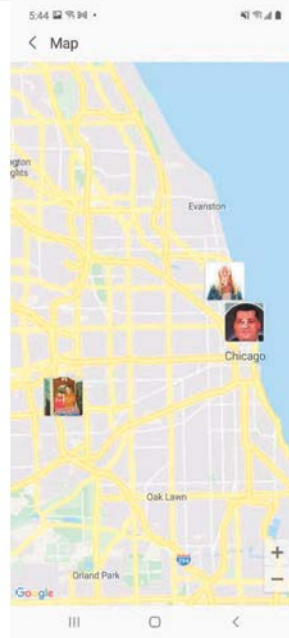
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| <p>person is a first profile image and</p> | |
| <p>31[b] wherein the second image associated with the second person is a second thumbnail image and the second digital file associated with the second person is a second profile image.</p> | <p>The second image associated with the second person is a second thumbnail image and the second digital file associated with the second person is a second profile image.</p> |

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| <p>32. The digital file storage system of claim 29, wherein, subsequent to the interface displaying the search</p> | <p><i>See</i> information for claim 29. Subsequent to the interface displaying the search filter view, the one or more processors are configured to execute the instructions to further cause the interface to display a map view including an interactive geographic map. The geographic map is interactive at least because Gallery permits zooming in/out and moving around the map.</p> |

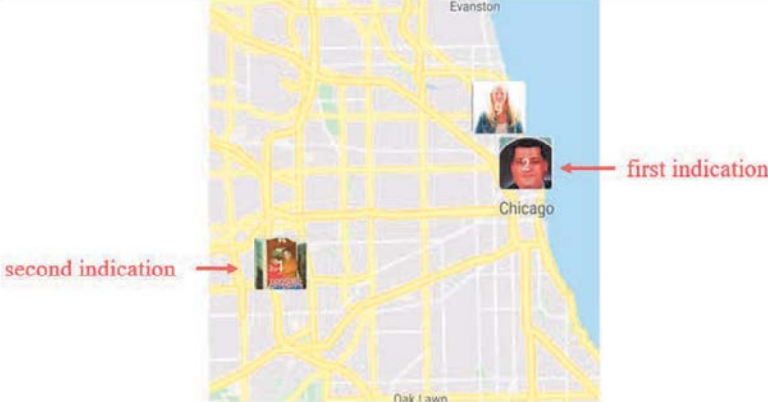
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filter view, the one or more processors are configured to execute the instructions to further cause the interface to display a map view including (i) an interactive geographic map, (ii) a first indication on the interactive map that is associated with one or more digital files, and (iii) a second indication on the interactive map that is associated with one or more digital files.



The map view also includes a first indication on the interactive map that is associated with one or more digital files and a second indication on the interactive map that is associated with one or more digital files.

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| <p>33[pre] The digital file storage system of claim 29,</p> | <p><i>See</i> information for claim 29.</p> |
| <p>33[a] wherein a first portion of the first information is generated by a user and</p> | <p>A first portion of the first information is generated by a user. <i>See</i> information for claim 19.</p> |
| <p>33[b] a second portion of the first information is automatically generated, and</p> | <p>A second portion of the first information is automatically generated. <i>See</i> information for claim 20.</p> |
| <p>33[c] wherein a first portion of the second information is generated by the user and</p> | <p>A first portion of the second information is generated by the user. <i>See</i> information for claim 19.</p> |
| <p>33[d] a second portion of the second</p> | <p>A second portion of the second information is automatically generated. <i>See</i> information for claim 20.</p> |

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| <p>information is automatically generated, and</p> | |
| <p>33[e] wherein the one or more processors are configured to execute the instructions to further cause a gallery view to be displayed on the interface, the gallery view including the plurality of digital files, the plurality of digital files including the first digital file, the second digital file, the first set of digital files, and the second set of digital files.</p> | <p>The one or more processors are configured to execute the instructions to further cause a gallery view to be displayed on the interface, the gallery view including the plurality of digital files, the plurality of digital files including the first digital file, the second digital file, the first set of digital files, and the second set of digital files. <i>See</i> information for claims 22 and 23.</p> |
| <p>34. The digital file storage system of claim 29, responsive to receiving a first one of the one or more criteria within the search-filter view, the one or more processors are configured to execute the instructions to further cause one or more of the plurality of digital files to be displayed on the interface based at least in</p> | <p><i>See</i> information for claim 29.</p> <p>Responsive to receiving a first one of the one or more criteria within the search-filter view, the one or more processors are configured to execute the instructions to further cause one or more of the plurality of digital files to be displayed on the interface based at least in part on the received first one of the one or more criteria. <i>See</i> information for claim 27.</p> |

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| part on the received first one of the one or more criteria. | |
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