UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

ANGEL TECHNOLOGIES LLC,
Patent Owner

Case IPR2023-00057
U.S. Patent No. 8,954,432

DECLARATION OF DR. ELI SABER, PH.D.
IN SUPPORT OF PATENT OWNER'S RESPONSE

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TABLE OF CONTENTS

I. INTRODUCTION 1

II. BACKGROUND AND QUALIFICATIONS 2

III. MATERIALS REVIEWED AND TIME OF ALLEGED INVENTION 7

IV. LEGAL STANDARDS 9

1. Overview 9
2. Patent Claims 9
3. Burden of Proof for Invalidity 10
4. Claim Construction 11
5. Person of Ordinary Skill in the Art 11
6. Prior Art 11
7. Anticipation 12
8. Obviousness 13

V. PERSON OF ORDINARY SKILL IN THE ART (POSITA) 16

VI. THE '432 PATENT 18

1. Existing Technology 18
2. Advantages Provided by the '432 Patent 19
3. System Components 20
4. The Operation of the '432 Patent's System 23

VII. CLAIM CONSTRUCTION 24

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VIII. OVERVIEW OF ALLEGED PRIOR ART REFERENCES.....24

1. Sharpe.....25

2. Eintracht.....29

3. Carey.....31

IX. THE ALLEGED PRIOR ART DOES NOT DISCLOSE OR SUGGEST THE CLAIMS OF THE '432 PATENT.....33

1. Ground 1: Sharpe Alone or in View of the Knowledge of a POSITA Does Not Disclose or Suggest the Limitations of Claims 1, 3, or 6-8.....33

A. Claim 6.....33

1. Limitation 6[e]: "obtaining identification data from a first tagging user of said computer network, wherein said identification data comprises said unique image identifier and a pictured user unique identifier of a user of said computer network pictured in said image data".....33

B. Dependent Claims 7-8.....37

1. Claim 7.....37

i. Limitation 7[a]: "obtaining identification data from a second tagging user of said computer network, wherein said identification data obtained from said second tagging user comprises said unique image identifier and an additional pictured user unique identifier of a user of said computer network pictured in said image data".....38

ii. Limitation 7[b]: "storing said identification data from said second tagging user [in] an identifications database accessible by other computers of said network whereby a user identifier may be associated with one or more image identifiers and an image identifier may be associated with one or more users identifiers".....39

2. Claim 8.....40

i. Limitation 8[a]: "receiving a request for said image data from a viewing user of said computer network".....40

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ii. Limitation 8[b]: "displaying list of pictured users of said network that have been identified by said first tagging user and said second tagging user in said image data" 44

C. Claim 1 47

1. Limitation 1[d]: "receiving from a first tagging user a request to identify users of said computer network in said image data wherein said request contains said image identification and the user identification of said first tagging user" 47

2. Limitation 1[e]: "responsive to said request presenting a client interface to said first tagging user configured to provide identifying information, wherein said identifying information comprises a user identification of a first pictured user of said comuter network and said image identification" 52

3. Limitation 1[h]: "receiving from a second tagging user a request to identify users in said image data wherein said request contains said image identification and the user identification of said second tagging user" 53

4. Limitation 1[i]: "responsive to said second tagging user's request, presenting a client interface to said second tagging user configured to provide identifying information, wherein said second tagging user's identifying information comprises an additional pictured user identification of an additional pictured user of said computer network and said image identification" 55

5. Limitation 1[m]: "displaying list of pictured users of said network that have been identified by said first tagging user and said second tagging user in said image data" 55

2. Ground 2: Sharpe and Eintracht Do Not Disclose or Suggest the Limitations of Claims 1-8 56

A. A POSITA Would Not Have Been Motivated to Combine Sharpe with Eintracht to Arrive at the Challenged Claims 56

B. Claim 2: "The method of 1, further comprising receiving location information that identifies coordinates of where the pictured users associated with said pictured user identifications appear within said

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image data.” 58

C. Claim 4: “The method of 2, wherein displaying list of pictured users of said computer network that have been identified by said first tagging user and said second tagging user in said image data requested further displays said coordinates of said pictured users in said image data.” 62

D. Claim 5: “The method of 1, wherein upon obtaining said pictured user identification associated with said image identification from a first tagging user or a second tagging user, an email is sent to any email address associated with said pictured users[’]identifications, said email notifying said pictured users that their user identification has been associated with said image data.” 62

3. Ground 3: Sharpe and Carey Do Not Disclose or Suggest the Limitations of Claim 3 63

4. Ground 4: Sharpe, Eintracht, and Carey Do Not Disclose or Suggest the Limitations of Claim 3 64

XI. CONCLUSION 65

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