

Filed on behalf of: Meta Platforms, Inc.

Entered: March 7, 2023

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.
Petitioner,

v.

ANGEL TECHNOLOGIES LLC,
Patent Owner.

Case No. IPR2023-00058
U.S. Patent No. 9,959,291

**PETITIONER'S REPLY TO
PATENT OWNER'S PRELIMINARY RESPONSE**

TABLE OF CONTENTS

I. PATENT OWNER FAILS TO ANTEDATE SHARPE.....1

 A. PO Fails to Show an Earlier Conception of the Claimed
 Invention.....2

 B. PO Fails to Show an Earlier Reduction to Practice5

 C. PO Fails to Show Diligence to a Subsequent Reduction to
 Practice5

 D. PO Provides No Evidence for Claims 2-26.....7

II. PATENT OWNER’S CLAIM CONSTRUCTION ARGUMENTS FAIL.....7

TABLE OF AUTHORITIES

Page(s)

CASES

Burroughs Wellcome Co. v. Barr Labs., Inc.,
40 F.3d 1223 (Fed. Cir. 1994)2

Coleman v. Dines,
754 F.2d 353 (Fed. Cir. 1985)1, 3

Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.,
800 F.3d 1375 (Fed. Cir. 2015)1, 6

Field v. Knowles,
183 F.2d 593 (C.C.P.A. 1950)1

Medichem, S.A. v. Rolabo, S.L.,
437 F.3d 1157 (Fed. Cir. 2006)1, 5

Perfect Surgical Techniques, Inc. v. Olympus Am., Inc.,
841 F.3d 1004 (Fed. Cir. 2016)5

Sewall v. Walters,
21 F.3d 411 (Fed. Cir. 1994)1, 2

REGULATIONS

37 C.F.R. § 1.131(b)1

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 9,959,291 (“’291 Patent”)
1002	Prosecution History of U.S. Patent No. 9,959,291 (“’291 FH”)
1003	Declaration of Dr. Benjamin B. Bederson (“Bederson”)
1004	<i>Curriculum Vitae</i> of Dr. Benjamin B. Bederson
1005	U.S. Patent No. 7,461,099 to Sharpe et al. (“Sharpe”)
1006	U.S. Patent No. 6,687,878 to Eintracht et al. (“Eintracht”)
1007	U.S. Patent No. 6,714,793 to Carey et al. (“Carey”)
1008	Prosecution History of U.S. Patent No. 10,628,480 (“’480 FH”)
1009	Excerpt from THE OXFORD AMERICAN DICTIONARY AND LANGUAGE GUIDE (1999), at 203 (contact).
1010	Excerpt from THE AMERICAN HERITAGE DICTIONARY (4th ed. 2001), at 191 (contact).
1011	Kuchinsky et al., <i>FotoFile: A Consumer Multimedia Organization and Retrieval System</i> , CHI ’99: PROCEEDINGS OF THE SIGCHI CONFERENCE ON HUMAN FACTORS IN COMPUTING SYSTEMS, 496-503 (May 1999) (“FotoFile”)
1012	U.S. Patent No. 7,739,139 to Robertson, et al. (“Robertson”)
1013	U.S. Patent App. Pub. No. 2002/0055955 to Lloyd-Jones, et al. (“Lloyd-Jones”)
1014	Reserved
1015	Yuichi Yagawa et al., <i>The Digital Album: A Personal File-tainment System</i> , PROCEEDINGS OF THE THIRD IEEE INTERNATIONAL CONFERENCE ON MULTIMEDIA COMPUTING AND SYSTEMS

Exhibit	Description
	(MULTIMEDIA '96), June 17-23, 1996, at 433-39.
1016	Ben Shneiderman & Hyunmo Kang, <i>Direct Annotation: A Drag-and-Drop Strategy for Labeling Photos</i> , 2000 IEEE INTERNATIONAL CONFERENCE ON INFORMATION VISUALIZATION (IV '00), July 19-21, 2000.
1017	Benjamin B. Bederson et al., <i>Pad++: A Zoomable Graphical Sketchpad For Exploring Alternate Interface Physics</i> , 7 J. OF VISUAL LANGUAGES & COMPUTING 3 (1996).
1018	Mark Roseman & Saul Greenberg, <i>Building Real-Time Groupware with GroupKit, a Groupware Toolkit</i> , 3 ACM TRANSACTIONS ON COMPUTER-HUMAN INTERACTION 1 (Mar. 1996), at 66-106.
1019	Excerpts from ROB KIRKLAND ET AL., DOMINO SYSTEM ADMINISTRATION (1999).
1020	Excerpts from DOROTHY BURKE & JANE CALABRIA, TEN MINUTE GUIDE TO LOTUS NOTES 4.6 (1997).
1021	Elizabeth F. Churchill, et al., <i>Anchored Conversations: Chatting in the Context of a Document</i> , CHI '00: PROCEEDINGS OF THE SIGCHI CONFERENCE ON HUMAN FACTORS IN COMPUTING SYSTEMS, April 2000, at 454-61.
1022	Mark S. Ackerman & David W. McDonald, <i>Answer Garden 2: Merging Organizational Memory with Collaborative Help</i> , CSCW '96: PROCEEDINGS OF THE 1996 ACM CONFERENCE ON COMPUTER SUPPORTED COOPERATIVE WORK, Nov. 1996, at 97-105.
1023	U.S. Patent No. 6,175,831 to Weinreich, et al.
1024	Excerpts from C.J. DATE, AN INTRODUCTION TO DATABASE SYSTEMS (6th ed. 1995).
1025	Excerpts from RANDY JAY YARGER ET AL., MYSQL & MSQL (1st ed. 1999).
1026	Ulla Merz & Roger King, <i>DIRECT: A Query Facility for Multiple Databases</i> , 12 ACM TRANSACTIONS ON INFORMATION SYSTEMS 4 (Oct. 1994), at 339-59.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.