UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC., Petitioner

v.

ANGEL TECHNOLOGIES LLC, Patent Owner

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

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

DOCKET

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VIII.	OVE	RVIEW OF ALLEGED PRIOR ART REFERENCES
1.	Sharp	pe27
2.	Eintr	acht
3.	Carey	y
IX. THE		E ALLEGED PRIOR ART DOES NOT DISCLOSE OR SUGGEST MS OF THE '291 PATENT
1.		nd 1: Sharpe Alone or in View of the Knowledge of a POSITA Does Disclose or Suggest the Limitations of Claims 1, 5 or 10-2635
	A.	Claim 26
	1.	Limitation 26[d]: "in response to receiving from the identifying user the input indicating the selection of the named user from the list of other users, determining a unique user identifier of the named user"
	2.	Limitation 26[e]: "storing an association between a unique user identifier of the named user and a unique digital media identifier corresponding to the digital media selected"
	B.	Claim 141
	1.	Limitation 1[d]: "determining, from a plurality of digital media accessible to one or more of the plurality of computing devices, a unique digital media identifier corresponding to a digital media selection input by the second user"
	2.	Limitation 1[e]: "providing, via one or more of the plurality of computing devices, a graphical user interface for presentation to the second user, the graphical user interface operative to receive one or more inputs from the second user indicating a selection of one or more of the plurality of users from descriptive information associated with unique user identifiers of the one or more of the plurality of users, the graphical user interface configured to display descriptive information associated with unique user identifiers of one or more of the plurality of users with a determined association with the second user"

3.	Limitation 1[f]: "receiving, via the communications network, an input initiated by the second user via the graphical user interface, the received input indicating a selection of the first user from descriptive information associated with the unique user identifier of the first user"			
4.	Limitation 1[g]: "determining the unique user identifier of the first user from the received input initiated by the second user indicating the selection of the first user"			
C.	Dependent Claims 5 and 10-2349			
1.	Claim 5: "The method of claim 1, wherein the digital media corresponding to the digital media selection input by the second user includes image data from a digital image."			
2.	Claim 15: "The method of claim 5, further comprising: [a] determining a photo album associated with the first user, the photo album including a collection of digital images; [b] in response to receiving the input initiated by the second user indicating the selection of the first user and to determining the photo album associated with the first user, adding the image data from the digital image to the photo album associated with the first user."			
5.	Claim 17: "The method of claim 1, wherein the unique user identifier of the first user is included in the descriptive information previously provided by the first user."			
6.	Claim 19: "The method of claim 1, wherein descriptive information includes a screen name."			
D.	Independent Claims 24 and 25			
	Ground 2: Sharpe and Eintracht Do Not Disclose or Suggest the Limitations of Claims 1-26			
А.	A POSITA Would Not Have Been Motivated to Combine Sharpe with Eintracht to Arrive at the Challenged Claims			
В.	Claim 2: "The method of claim 1, further comprising in response to receiving the input initiated by the second user indicating the selection of the first user and to determining the unique user			

2.

		identifier of the first user, providing information about the stored association to a computing device of the first user, the information indicating that the first user has been associated with one or more of the plurality of digital media."		
	C.	Claim 3: "The method of claim 2, wherein the information about the stored association is provided via an email."		
	D.	Claim 6: "The method of claim 5, further comprising receiving, via the communications network, one or more inputs initiated by the second user indicating a set of coordinates corresponding to a location of the first user within the image data."		
3.	Ground 3: Sharpe and Carey Do Not Disclose or Suggest the Limitations of Claims 18-19 and 26			
4.		Ground 4: Sharpe, Eintracht and Carey Do Not Disclose or Suggest the Limitations of Claims 18-19 and 26		
X.	CON	CLUSION		

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