

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 9,959,291

PATENT OWNER'S RESPONSE

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
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b.	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”	29
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3.	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 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.”54

4. Claim 3: “The method of claim 2, wherein the information about the stored association is provided via an email.”55

5. 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.”56

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TABLE OF AUTHORITIES

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CASES	
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