

Filed on behalf of: Meta Platforms, Inc.

Filed: November 17, 2023

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.
Petitioner,

v.

ANGEL TECHNOLOGIES GROUP LLC,
Patent Owner.

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

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I. INTRODUCTION1

II. GROUND 1: SHARPE ALONE OR IN VIEW OF THE KNOWLEDGE OF A POSA RENDERS OBVIOUS CLAIMS 1, 5, 10-261

 A. Sharpe Alone Or In View Of The Knowledge Of A POSA Teaches The “Unique User Identifier” (26[d-e], 1[e-g])2

 B. Sharpe Alone Or In View Of The Knowledge Of A POSA Teaches The “Digital Media Selection Input” (1[d], 5, 12-14)5

 1. PO Misinterprets the Claim Language.....6

 2. Even Under PO’s Incorrect Interpretation, the Prior Art Discloses the Limitation7

 3. PO’s Remaining Argument is Meritless8

 C. Sharpe Alone Or In View Of The Knowledge Of A POSA Teaches Independent Claims 24 And 25.....8

 D. Sharpe Alone Or In View Of The Knowledge Of A POSA Teaches The “List of Descriptive Information” (Claims 13, 14).....9

 E. Sharpe Alone Or In View Of The Knowledge Of A POSA Teaches The Remaining Dependent Claims (Claims 15, 17, 19).....11

 1. Dependent Claim 15 Would Have Been Obvious11

 2. Dependent Claim 17 Would Have Been Obvious12

 3. Dependent Claim 19 Would Have Been Obvious13

 F. The Petition Plainly Presents Sharpe As A Single-Reference Obviousness Ground13

III. GROUND 2: SHARPE IN VIEW OF EINTRACHT RENDERS OBVIOUS CLAIMS 1-2618

A. A POSA Would Have Been Motivated To Combine Sharpe
With Eintracht18

B. PO Fails To Address Eintracht’s Disclosure Of The Purportedly
Missing Claim Limitations (Claims 1, 13, 14, 24, 25).....20

C. Sharpe In View Of Eintracht Teaches The Claimed Email
Notifications (Claims 2, 3).....21

D. Sharpe In View Of Eintracht Teaches “Coordinates” (Claim 6)22

IV. GROUNDS 3 & 4: SHARPE IN VIEW OF CAREY, AND SHARPE
IN VIEW OF EINTRACHT AND CAREY RENDERS OBVIOUS
CLAIMS 18-19, 26.....24

V. CONCLUSION.....25

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Adobe, Inc. v. Realtime Adaptive Streaming LLC</i> , No. IPR2019-00712, 2020 WL 4809374 (P.T.A.B. Aug. 17, 2020).....	16
<i>Application of Skoner</i> , 517 F.2d 947 (C.C.P.A. 1975)	14
<i>Arctic Cat Inc. v. Bombardier Recreational Prods. Inc.</i> , 876 F.3d 1350 (Fed. Cir. 2017)	15
<i>Beckson Marine, Inc. v. NFM, Inc.</i> , 292 F.3d 718 (Fed. Cir. 2002)	20
<i>Bradium Techs. LLC v. Iancu</i> , 923 F.3d 1032 (Fed. Cir. 2019)	9, 22
<i>Dow Jones & Co., Inc. v. Ablaise Ltd.</i> , 606 F.3d 1338 (Fed. Cir. 2010)	14, 16
<i>Elekta Ltd. v. ZAP Surgical Sys., Inc.</i> , 81 F.4th 1368 (Fed. Cir. 2023)	12, 22, 23, 24
<i>EWP Corp. v. Reliance Universal Inc.</i> , 755 F.2d 898 (Fed. Cir. 1985)	22
<i>Genentech, Inc. v. Chiron Corp.</i> , 112 F.3d 495 (Fed. Cir. 1997)	7
<i>Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.</i> , 821 F.3d 1359 (Fed. Cir. 2016)	15
<i>Koninklijke Philips N.V. v. Google LLC</i> , 948 F.3d 1330 (Fed. Cir. 2020)	14
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	11, 12, 22

M&K Holdings, Inc. v. Samsung Elecs. Co.,
985 F.3d 1376 (Fed. Cir. 2021)17, 18

Maxlite, Inc. v. Jiaxing Super Lighting Elec. Appliance Co., Ltd.,
No. IPR2020-00208, 2022 WL 1416695 (P.T.A.B. Apr. 29, 2022)5, 8, 21, 25

Novartis Pharms. Corp. v. West-Ward Pharms. Int’l Ltd.,
923 F.3d 1051 (Fed. Cir. 2019)23

Polygroup Ltd. MCO v. Willis Elec. Co., Ltd,
759 F. App’x 934 (Fed. Cir. 2019)16

Realtime Data, LLC v. Iancu,
912 F.3d 1368 (Fed. Cir. 2019)15, 16

Smith & Nephew, Inc. v. Ethicon, Inc.,
276 F.3d 1304 (Fed. Cir. 2001)7

In re Stepan Co.,
868 F.3d 1342 (Fed Cir. 2017)16, 17

Therasense, Inc. v. Becton, Dickinson & Co.,
593 F.3d 1325 (Fed. Cir. 2010)16

TQ Delta, LLC v. Cisco Sys., Inc.,
942 F.3d 1352 (Fed. Cir. 2019)9, 20

Other Authorities

37 C.F.R. § 42.23(b)5

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.