UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC., Petitioner,

v.

ANGEL TECHNOLOGIES LLC, Patent Owner.

Case IPR2023-00059 U.S. Patent 10,417,275

PATENT OWNER'S RESPONSE

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Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, Virginia 22313-1450 Submitted Electronically via the Patent Review Processing System



TABLE OF CONTENTS

I.	INTI	RODUCTION			
II.	BACKGROUND				
	A.	The '275 Patent			
		1.	Existing Technology	3	
		2.	Advantages Provided by the '275 Patent	4	
		3.	System Components		
		4.	The Operation of the '275 Patent's System	8	
	B.	ALLEGED PRIOR ART			
		1.	Sharpe	9	
		2.	Eintracht	13	
		3.	FotoFile	16	
		4.	Carey	16	
III.	LEV	EL OF	F ORDINARY SKILL	17	
IV.	CLA	ONSTRUCTION	17		
V.	THE CITED REFERENCES DO NOT RENDER CLAIMS 1-12 UNPATENTABLE				
	A.	A POSITA Would Not Have Been Motivated to Combine Sharpe with Eintracht and FotoFile to Arrive at the Challenged Claims			
	B.	The Petition Fails to Explain How the Combination of Sharpe and Eintracht Would Operate			
	C.	Ground 1: Sharpe, Eintracht, and FotoFile Do Not Render Obvious Claims 1-12			
	1.	Limitation 1[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.	more	itation 1[e]: "receiving, from the identifying user, one or e inputs indicating a set of coordinates corresponding to a tion of the named user within the image; and"	27	



	3.	image data of other images accessible to said computer system to locate images matching characteristics of a subset of image data bound by the set of coordinates corresponding to the location of the named user within the image, wherein the set of coordinates corresponding to the location of the named user		
		within the image is associated with the unique user identifier of the named user and the unique image identifier."	32	
	4.	Dependent Claims 2-12	35	
	a.	Claims 3 and 4	35	
	b.	Claim 7	37	
	c.	Claim 8	38	
	d.	Claim 9	39	
	e.	Claim 11	41	
	D.	Ground 2: Sharpe in View of Eintracht, FotoFile, and Carey Does Not Render Obvious Claims 1-12	42	
	Е.	The Petition's Reliance on a Combination of References Without Including Any Analysis Regarding the Secondary References is Impermissibly Vague	42	
VI.	CONCLUSION		44	



TABLE OF AUTHORITIES

Chana	Page(s)
CASES	
3M Company v. Evergreen Adhesives, Inc., No. 2020-1738 (Fed. Cir. June 25, 2021)	43
ActiveVideo Networks, Inc. v. Verizon Commc'ns, Inc., 694 F.3d 1312 (Fed. Cir. 2012)	20, 21
ADT LLC v. Vivint, Inc., IPR2022-00634, Paper No. 7 (PTAB Oct. 4, 2022)	21
Amgen Inc. v. Sandoz Inc., 66 F.4th 952 (Fed. Cir. 2023)	25
ATD Corp. v. Lydall, Inc., 159 F.3d 534 (Fed. Cir. 1998)	33
Daifuku Co. v. Murata Machinery, Ltd., IPR2015-00084, Paper No. 10 (PTAB May 4, 2015)	21
Fisher & Paykel Healthcare Ltd. V. ResMed R&D Ger. GmbH, IPR2017-00272, Paper 41 (P.T.A.B. Sept. 6, 2018)	20
In re Oelrich, 666 F.2d 578 (CCPA 1981)	24, 25, 26
Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co., 868 F.3d 1013 (Fed. Cir. 2017)	17
Parus Holdings, Inc. v. Google LLC, 70 F.4th 1365 (Fed. Cir. 2023)	43
Personal Web Tech. v. Apple, 848 F.3d 987 (Fed. Cir. 2017)	20
PersonalWeb Technologies, LLC v. Apple, Inc., 917 F.3d 1376 (Fed. Cir. 2019)	24, 25
Phillips v. AWH Corp., 415 F.3d 1303 (Fed. Circ. 2005) (en banc)	17



Toyota Motor Corp. v. Cellport Systems, Inc., IPR2015-00633, Paper No. 11 (Aug. 14, 2015)	17
STATUTES	
35 U.S.C. § 312(a)(3)	43
35 U.S.C. § 316(e)	2
OTHER AUTHORITIES	
37 C.F.R. § 42.6(a)(3)	43
37 C.F.R. § 42.22(a)(2)	43
37 C.F.R. § 42.104(b)(4)-(5)	43
37 C.F.R. § 100(b) (2019)	17



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