UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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INTELLECTUAL INTEGRITY, LLC,
Petitioner

v.

APPLE INC.,
Patent Owner

Patent No. 7,864,163

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Inter Partes Review No. IPR2016-00500

PATENT OWNER'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. § 42.107

sf-3645696

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TABLE OF AUTHORITIES

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EXHIBIT LIST

Title	Exhibit No.
U.S. Patent Appl. No. 11/850,013, filed on Sept. 4, 2007 (Original Claims)	2001
Non-Final Rejection, dated June 11, 2010	2002
Response to Office Action and Interview Summary, dated Sept. 13, 2010	2003
Notice of Allowability, dated Oct. 20, 2010	2004
U.S. Patent Application No. 2004/0103371 to Chen et al.	2005
U.S. Patent Application No. 2007/0250768 to Funakami et al.	2006

I. INTRODUCTION

To anticipate a claim, a prior art reference must disclose each and every claim limitation expressly or inherently.[1]

In its petition for *inter partes* review, Intellectual Property fails to demonstrate that the Harada reference[2] satisfies the "translation" limitations of all challenged claims of the '163 patent.[3] Intellectual Integrity focuses only on the "enlargement" and "substantially centered" limitations of claims 2, 50, and 52, ignoring their "translation" limitations entirely.

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[1] *See, e.g., Whitserve, LLC v. Computer Packages, Inc.*, 694 F.3d 10, 21 (Fed. Cir. 2012) ("[A] claim is anticipated if each and every limitation is found either expressly or inherently in a single prior art reference.") (internal quotation marks omitted); *Eli Lilly & Co. v. Zenith Goldline Pharms., Inc.*, 471 F.3d 1369, 1375-76 (Fed. Cir. 2006) (to anticipate, a "prior art reference must disclose each and every feature of the claimed invention, either explicitly or inherently").

[2] S. Harada et al., "Lost in Memories: Interacting with Photo Collections on PDAs," *Proceedings of the Fourth ACM/IEEE-CS Joint Conference on Digital Libraries* (2004) (Ex. 1008).

[3] U.S. Patent No. 7,864,163 (filed Jan. 4, 2011) (Ex. 1001).

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