

Petitioner's Objections to Patent Owner's Demonstrative Exhibits
IPR2024-00286 (U.S. Patent No. 11,611,520)

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.
Petitioner

v.

MOTION OFFENSE, LLC
Patent Owner

IPR2024-00286
U.S. Patent No. 11,611,520

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S
DEMONSTRATIVE EXHIBITS**

Pursuant to the Board's March 25, 2025 Order Setting Oral Argument (Paper 37), Petitioner submits the below objections to Slides 77, 78, and 83 in Patent Owner's Demonstratives (Paper 43) because they include issues that are in dispute between the parties as set forth in Petitioner's Motion to Exclude (Paper 40), Patent Owner's Opposition to Petitioner's Motion to Exclude (Paper 41), and Petitioner's Reply to Patent Owner's Opposition (Paper 44). Petitioner has met and conferred in good faith with Patent Owner concerning Slides 77, 78, and 83 and timely submits these unresolved objections, no later than the time of the hearing (*see* Paper 37 at 4). Copies of the objected-to Slides 77, 78, and 83 are attached hereto as Appendix A.

Slide 77: (Objected to in part.) Petitioner objects for the following reasons: this slide includes quotes from ¶¶ 9, 10, and 12 of Provisional Application No. 61/233,787 (the "787 provisional"). On March 27, 2025, Petitioner objected to the same material included in Patent Owner's Sur-Reply. *See* Paper 38 at 3-7. Petitioner timely filed its Motion to Exclude (Paper 40) on April 4, 2025. Similarly, Petitioner objects to Slide 77 under FRE 401-403 as not being relevant to any issue in this *inter partes* review and/or unduly prejudicial. Further, because Petitioner objected to the same material in Patent Owner's Sur-Reply and that same material is the subject of the Motion to Exclude, Petitioner respectfully requests that the objected-to material in Slide 77 be included in the material subject to the pending Motion to Exclude. Additionally, the Board has twice denied Patent Owner's request to replace the

current EX2026 with the '787 provisional. *See* Paper 39 at 2-5; *see also* 37 CFR § 42.63 (requiring that evidence in an IPR proceeding be filed as an exhibit).

Slide 78: (Objected to in part.) Petitioner objects for the following reasons: this slide includes an excerpt of Figure 1 of the '787 provisional. On March 27, 2025, Petitioner objected to the same material included in Patent Owner's Sur-Reply. *See* Paper 38 at 3-7. Petitioner timely filed its Motion to Exclude (Paper 40) on April 4, 2025. Similarly, Petitioner objects to Slide 78 under FRE 401-403 as not being relevant to any issue in this *inter partes* review and/or unduly prejudicial. Further, because Petitioner objected to the same material in Patent Owner's Sur-Reply and that same material is the subject of the Motion to Exclude, Petitioner respectfully requests that the objected-to material in Slide 78 be included in the material subject to the pending Motion to Exclude. Additionally, the Board has twice denied Patent Owner's request to replace the current EX2026 with the '787 provisional. *See* Paper 39 at 2-5; *see also* 37 CFR § 42.63 (requiring that evidence in an IPR proceeding be filed as an exhibit).

Slide 83: (Objected to in part.) Petitioner objects for the following reasons: this slide refers to a 2009 Dropbox guide that is not of record and that is part of Patent Owner's unfounded allegations of Petitioner's violation of 37 C.F.R. § 42.51(b)(1)(iii). On March 27, 2025, Petitioner objected to the same material included in Patent Owner's Sur-Reply. *See* Paper 38 at 7-8. Petitioner timely filed

its Motion to Exclude (Paper 40) on April 4, 2025. Similarly, Petitioner objects to Slide 83 under FRE 401-403 as not being relevant to any issue in this *inter partes* review and/or unduly prejudicial. Further, because Petitioner objected to the same material in Patent Owner's Sur-Reply and that same material is the subject of the Motion to Exclude, Petitioner respectfully requests that the objected-to material in Slide 83 be included in the material subject to the pending Motion to Exclude.

Respectfully submitted,

/Trishan Eram/

Trishan Eram

Registration No. 74,075

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2025, I caused a true and correct copy of the foregoing materials:

- Petitioner's Objections to Patent Owner's Demonstrative Exhibits

to be served via electronic mail by consent on counsel of record at:

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Respectfully Submitted

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APPENDIX A

The Incorporated *Houston* '787 Provisional Confirms PO's Position

17[d]: . . . for permitting avoidance of at least one file from being communicated to and stored at the second node until an initiation of the communication of the at least one file by a user of the second node is detected and the communication commences via at least one server that stores the at least one file[.]

17[e]: receiving, from the second node and at [] least one server, a signal for causing creation of a first representation of the at least one folder, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page;

17[f]: causing, at the second node, receipt of the at least one web page, that results in display, at the second node and via the at least one web page, the first representation of the at least one folder that is stored at the at least one server; and

17[g]: causing, at the second node, receipt of code for storage at the second node and cooperation with a file explorer interface of a client-based file explorer application, for being utilized to: cause creation of a second representation of the at least one folder, in a location among one or more folders, that is stored at the second node and that is displayable via the file explorer interface of the client-based file explorer application.

¶9 (“the innovative technology presented herein eliminates the need to have a person maintaining a central server for a business. The technology makes local copies of data The technology allows for a superior user experience, since multiple users may be offline or online and still use this technology.”); ¶10 (“The technology provides local input/output speed (which equates to less speed time in comparison to traditional systems) because the files are local, and thus listing and accessing of the files appear much more quickly to users than if they had used traditional systems.”); ¶12 (“Also, most applications of a traditional file server architecture are (PO Sur-reply at 10)

Houston’s system “automatically” and “immediately” synchronizes folders and their contents among multiple clients by downloading local copies of shared documents to each user’s client.

The Incorporated *Houston* '787 Provisional Confirms PO's Position

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17[e]: receiving, from the second node and at [] least one server, a signal for causing creation of a first representation of the at least one folder, in a location among one or more folders, that is stored at the at least one server and that is displayable via at least one web page;

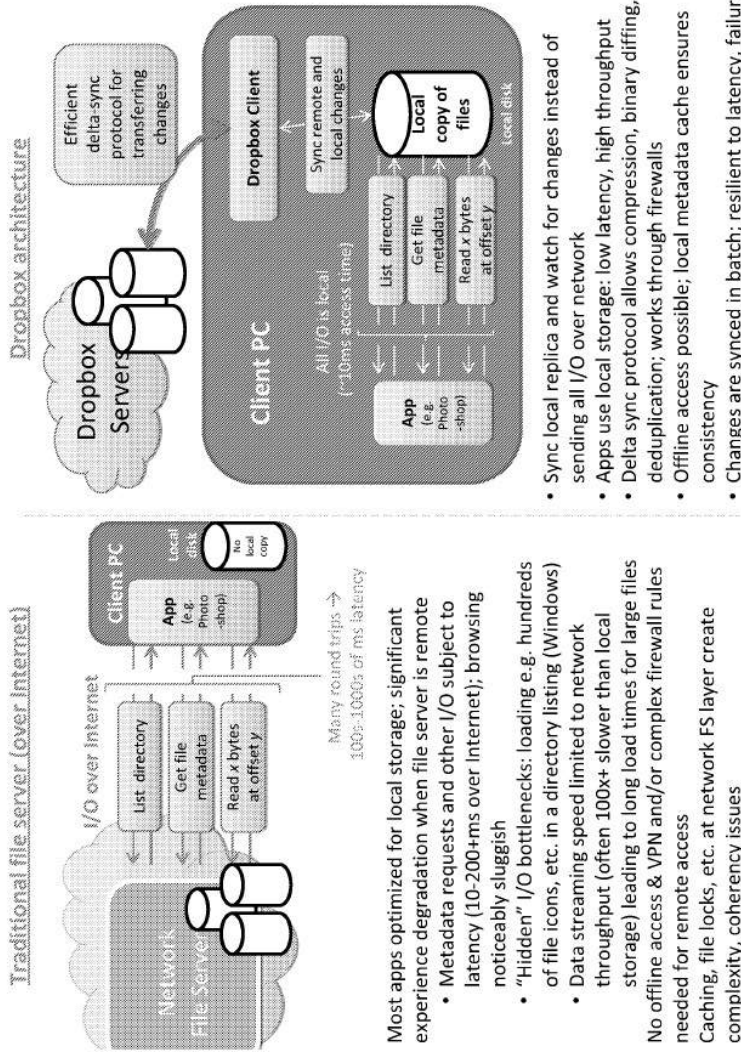
17[f]: causing, at the second node, receipt of the at least one web page, that results in display, at the second node and via the at least one web page, the first representation of the at least one folder that is stored at the at least one server; and

17[g]: causing, at the second node, receipt of code for storage at the second node and cooperation with a file explorer interface of a client-based file explorer application, for being utilized to: cause creation of a second representation of the at least one folder, in a location among one or more folders, that is stored at the second node and that is displayable via the file explorer interface of the client-based file explorer application.

Houston's system "automatically" and "immediately" synchronizes folders and their contents among multiple clients by downloading local copies of shared documents to each user's client.

(POR at 42, 17-18)

Traditional File Server Architecture vs. Dropbox



(PO Sur-reply at 11)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Petitioner’s “Checkmark Overlay” Argument Fails

fn. 7.) That should speak for itself. Dropbox has access to all relevant information concerning the icon overlays in *Houston*, yet *it did not provide any Dropbox materials for support*. Instead, it appears to have *withheld* such information because it is inconsistent. A Dropbox guide from 2009 states that the checkmark overlay refers to syncing files to Dropbox but makes no reference to downloads. It indicates that Dropbox and SugarSync had different icon overlay functionality. (*Cf.* EX1002,

(PO Sur-reply at 12)

Petitioner’s “checkmark overlay” argument is misleading, at best

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE