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Date: March 1, 2012 Signature: /Michael P. Fortkort/
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IN THE UNITED STATES PATENT & TRADEMARK OFFICE

APPLICANT: NADER ASGHARI-KAMRANI and KAMRAN ASGHARI-KAMRANI

SERIAL NO.: 12/210,926

FILING DATE: September 15, 2008

EXAMINER: Mr. Abdulhakim Nobahar

ART UNIT: 2432

TITLE: CENTRALIZED IDENTIFICATION AND AUTHENTICATION SYSTEM AND METHOD

ATTORNEY DOCKET: KAMR002US0

CONFIRMATION NO.: 7516

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AFFIDAVIT UNDER RULE 132

Applicants hereby submit this affidavit in support of their response to the Office Action mailed January 6, 2012 which rejected the pending claims.

This affidavit is being provided as testimony in the prosecution of U.S. Serial No. 12/210,926, and pursuant to the provisions of 37 C.F.R. § 1.132. The witness hereby avers and testifies as follows:

U.S. Patent Application No. 12/210,926
Attorney Docket No. KAMR002US0

1. I am Nader Asghari-Kamrani, one of the inventors listed in U.S. patent Application, which is the subject of the present proceeding ("*Kamrani*").
2. I received a degree in computer science from Technical University of Vienna, in Vienna, Austria in 1993. I have been working in the field of authentication over communication networks since 2000. I am one of skill in the art of authentication and electrical transactions, including PKI and digital signature, online credit card payment as well as banking transactions.
3. I am familiar with the specification and pending claims of the present Application.
4. I have reviewed U.S. Patent Publication No. 2010/0100724 A1 by Kaliski, Jr. ("*Kaliski, Jr.*").

Nonce Not Equivalent to SecureCode

5. One of skill in the authentication art would understand that an **identifier** is non secret information such as a name or label that identifies an entity. And in the world of authentication an identifier is only used for identification of an entity and not for authentication of the entity.
6. One of skill in the authentication art would understand that in *Kaliski, Jr.*, a nonce is a **session identifier**. "The authentication server 730 returns the blinded result R to the client 715, along with a nonce or other session identifier 772." *Kaliski, Jr.*, ¶ [0111] (emphasis supplied).

A *cryptographic nonce* is an arbitrary number used to establish the uniqueness or discreteness of an operation. That is, an operation such as a data request is accompanied by a nonce in order to demonstrate that the request is not a repeat or re-play of a previous request.

A *session* is a series of information exchanges between two communicating parties, usually involving an initiation protocol and more than one message in each direction.

U.S. Patent Application No. 12/210,926
Attorney Docket No. KAMR002US0

In *Kaliski, Jr.* a nonce is used for identification of a user's session. In the client/server world, a session refers to all the requests that a single client makes to a server. A session is specific to each user and for each user a new session is created to track all the requests from that user. Every user has a separate session and separate session identifier is associated with that session.

7. One of skill in the authentication art would understand that the nonce in *Kaliski, Jr.* is not equivalent to the SecureCode of the present application. A nonce is a session identifier associated with a user's session, but a nonce is not used for authentication of a user, as is the SecureCode recited in the claims of *Kamrani*.

8. One of skill in the authentication art would understand that the statement "the nonce corresponds to the recited dynamic SecureCode" is inaccurate. In *Kaliski, Jr.* the web server receives the nonce and hardened password from the client and authenticates the user based on successful decryption of a digital signature associated with the hardened password. *Kaliski, Jr.*, ¶¶ [0109] and [0112]. The nonce is used by the web server to identify the user and the hardened password used in the authentication process of authenticating the user. In *Kamrani*, a dynamic code authenticates a user whereas in *Kaliski, Jr.* a nonce is a session identifier. Therefore the argument that "the nonce corresponds to the recited dynamic code" is invalid.

No Authentication Request Message

9. One of skill in the authentication art would understand that in the system of *Kaliski, Jr.* there is nothing equivalent to a Central Entity receiving an authentication request message, as recited in the claims at issue. The Office Action equates the claimed authentication request message to message 776 of *Kaliski, Jr.* But, message 776 that the authentication server in FIG 7 of *Kaliski, Jr.* receives is NOT an authentication request message. Rather, message 776 indicates simply whether or not the authentication of the

U.S. Patent Application No. 12/210,926
Attorney Docket No. KAMR002US0

client by the web server was successful. *See Kaliski, Jr.* ¶¶ [0109] through [0112]. This message 776 is a one way acknowledgement and expects no return, whereas the authentication request message as recited in the claims at issue is a different type of message than the cited acknowledgement as the claimed authentication request should generate a response because it is a REQUEST as opposed to an acknowledgement. Thus, the message in *Kaliski, Jr.* cited by the Office Action at issue is not equivalent to the claimed authentication request message in *Kamrani*. Thus, one of skill in the authentication art would understand that the argument in the Office Action equating the claimed authentication request message to the acknowledgement message 776 in *Kaliski, Jr.* is not valid.

No Central Entity Authenticating User

10. One of skill in the authentication art would understand that there is nothing in *Kaliski, Jr.* equivalent to a Central Entity authenticating the user as recited in the claims at issue. The Office Action equates the Central Entity to the authentication server 730 in *Kaliski, Jr.* But, the authentication server 730 in FIG 7 never authenticates the client. Rather, the web server 710 authenticates the client based on successful decryption of the client's digital signature associated with the hardened password. *See Kaliski, Jr.* ¶¶ [0109] through [0112]. Moreover, the web server 710 of *Kaliski, Jr.* does not generate anything equivalent to the claimed SecureCode, as recited in the claims at issue. Thus, neither the web server 710 nor the authentication server 730 of *Kaliski, Jr.* performs the functions of the Central Entity recited in the claims.

11. One of skill in the authentication art would understand that in *Kaliski, Jr.* a user's client application generates a hardened password (based on the blinded result R received from the authentication server) and submits the generated hardened password to the web server and not to the authentication server cited by the Office Action. In *Kaliski, Jr.* the

U.S. Patent Application No. 12/210,926
Attorney Docket No. KAMR002US0

client receives the blinded result R along with a nonce from the authentication server and generates the hardened password at the client side for authentication to the web server.

Kaliski, Jr., ¶ [0111].

12. One of skill in the authentication art would understand that the argument in the Office Action equating the claimed “authenticating by the Central-Entity the user during the transaction, if the digital identity is valid” with the authentication protocol in *Kaliski, Jr.* is not valid. The authentication server 730 does not authenticate the client; it is the web server that authenticates the client. And, the web server 710 of *Kaliski, Jr.* also cannot be the claimed Central Entity because the web server does not generate anything equivalent to the claimed SecureCode. Thus, there is no Central Entity authenticating the user in *Kaliski, Jr.*

Authentication Process Different

13. The web server of *Kaliski, Jr.* stores the user’s personal information as encryption secrets (See *Kaliski, Jr.*, ¶ [0103]) and the encrypted secrets are stored such that they can be decrypted with a decryption key/hardened password. In *Kaliski, Jr.* a blind function evaluation protocol is used by the client to derive a decryption key/hardened password from a blinded result R received from the authentication server (See *Kaliski, Jr.*, ¶ [0111]), to decrypt the encrypted secrets. The web server authenticates the client if the hardened password received from the client successfully decrypt user’s information.

14. It is clear that in *Kaliski, Jr.*, authentication is based on a cryptographic protocol. The use of this cryptographic approach allows authenticity of a client to be checked by creating a digital signature of a user’s personal information using the encryption key, which can be verified using hardened password as the decryption key received from the client during the transaction.

15. One of skill in the authentication art would understand that in the blind function evaluation protocol used in *Kaliski, Jr.* (See, *Kaliski, Jr.* ¶ [0038]), the client has some secret

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