# UNITED STATES PATENT AND TRADEMARK OFFICE

# **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

UNIFIED PATENTS INC.,

Petitioner,

v.

# UNIVERSAL SECURE REGISTRY LLC,

Patent Owner

Case IPR2018-00067

U.S. Patent No. 8,577,813

PATENT OWNER'S REPLY IN SUPPORT OF ITS MOTION TO AMEND PURSUANT TO 37 C.F.R. § 42.121



Case No. IPR2018-00067 U.S. Patent No. 8,577,813

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	A.	Claims 27-31, 37-41, 50-52: "generate a seed using at least two of an electronic serial number, a discrete code associated with the electronic ID device, a PIN, a time value, and the biometric input to generate the encrypted authentication information, the seed being employed by the processor to generate the non- predictable value."			
		1.	Labrou fails to disclose or teach the claim amendments2		
		2.	A person of ordinary skill in the art would not combine Maes with Labrou to achieve the claimed limitation		
	B.	devie secre ID d	ms 42-44, 46-49: "wherein data stored in the electronic ID ce is subject to a mathematical operation employing the et information that acts to modify the datathe electronic evice uses the secret information to reverse the mematical operation and render the data legible." (42[g])9		
		1.	Petitioner fails to show that a person of ordinary skill in the art would be motivated to modify Maes in view of a PHOSITA's knowledge and ordinary skill		
		2.	Petitioner fails to show that a person of ordinary skill in the art would be motivated to modify Maes in view of Labrou		
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# PATENT OWNER'S LIST OF EXHIBITS

Ex. 2001	Unified-USR Stipulated Protective Order
Ex. 2002	Redline Comparison to Default Protective Order
Ex. 2003	U.S Patent App. No. 13/237,184
Ex. 2004	Declaration of Dr. Markus Jakobsson in Support of Patent Owner Response
Ex. 2005	Curriculum Vitae of Dr. Markus Jakobsson
Ex. 2006	July 31, 2018 Deposition Transcript of Dr. Eric Cole
Ex. 2007	Petitioner's Website Dated Jan. 1, 2014
Ex. 2008	Petitioner's Website Dated Mar. 2, 2016
Ex. 2009	Petitioner's Website Dated Jun. 11, 2013
Ex. 2010	Brief of Amici Curiae Unified Patents
Ex. 2011	Confidential Document
Ex. 2012	Confidential Document
Ex. 2013	Declaration in Support of Unopposed Motion for Admission Pro Hac Vice of Harold A. Barza
Ex. 2014	Declaration in Support of Unopposed Motion for Admission Pro Hac Vice of Jordan Kaericher
Ex. 2015	Dec. 14, 2018 Deposition Transcript of Dr. Eric Cole

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