

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner,

v.

UNIVERSAL SECURE REGISTRY LLC
Patent Owner

Case IPR2018-00808
U.S. Patent No. 9,530,137

**PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 35 U.S.C. § 313 AND 37 C.F.R. § 42.107**

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| Exhibit # | Description |
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I. INTRODUCTION

In just one month, Petitioner Apple Inc. ("Petitioner") has flooded the Board with *eleven* petitions challenging four related patents assigned to Universal Secure Registry LLC ("Patent Owner"). *See* IPR2018-00808, IPR2018-00809, IPR2018-00810, IPR2018-00811, IPR2018-00812, IPR2018-00813, CBM2018-00022, CBM2018-00023, CBM2018-00024, CBM2018-00025, CBM2018-00026. The present Petition (Paper 1, IPR2018-00808) is one of *three* petitions challenging claims 1, 2, 5-7, 9, 10 and 12 of U.S. Patent No. 9,530,137 ("the '137 Petition"). *See also* IPR2018-00809, CBM2018-00022. Petitioner is unable to muster any anticipation ground against any claim of the '137 patent. Instead, each of its petitions puts forth hindsight combinations that selectively cull components from prior art references in an attempt to fit the parameters of the patented invention. In the present case, the Petition attempts to combine "Maritzen in view of Gullman and Niwa" to invalidate the independent claims—Claims 1 and 12—of the '137 patent.

Like its other petitions attacking the '137 patent, this Petition fails for several independent reasons. **First**, Petitioner admits that Maritzen does not disclose Limitations 1[a] and 12[b] of the independent claims—which requires the use of PIN-based authentication—but argues that Gullman discloses PIN-based authentication and can be combined with Maritzen to arrive at these limitations. *See* Section VI.A. But Petitioner fails to demonstrate that a POSITA would have been

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