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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

PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 1, 2, AND 5-12

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77 Fed. Reg. 48764 (Aug. 14, 2012)15

I. INTRODUCTION

The '137 patent is generally directed toward systems for authenticating a user and approving a transaction. The patent owner, Universal Secure Registry, LLC (“USR”), has described the claimed invention similarly, asserting that the '137 patent relates to a mobile transaction approval system that involves local authentication, remote authentication, a PIN, biometric information, and a time-varying code. *See* Plaintiff’s Answer Brief in Opposition to Defendants’ Motion to Dismiss (“Opp.”) at 10 (Ex-1018) (“A person wishing to use a device for a transaction must first be authenticated by the device based on secret information and biometric information provided by the person... The device then generates authentication information, an indicator of the device’s biometric authentication of the user, and a time varying value that creates a one-time variable token that can be sent via a merchant to a second device for transaction approval.”).

When the application for the '137 patent was filed, however, the use of local and remote authentication, PINs, biometric information, and time-varying codes to authenticate a user engaged in a financial transaction was well known in the art. In fact, the prior art is replete with disclosures of systems that perform user authentication in this manner. For example, prior art reference U.S. Patent Application Publication No. 2004/0236632 (“Maritzen”) (Ex-1013) discloses a handheld device configured to locally authenticate a user based on biometric

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