

**APPLE INC.,  
VISA INC., and VISA U.S.A. INC.**

**v.**

**Universal Secure Registry LLC**

**Case Nos. IPR2018-00809, -00810, -00811  
U.S. Patent Nos. 9,530,137 and 9,100,820**

**Patent Owner's Demonstratives**

**Hearing Date: July 16, 2019**

**IPR2018-00809**

# Claims 1, 12: “one or more signals including...”

## '137 Patent Claim 1[e]:

wherein the first processor is programmed to generate one or more signals including the first authentication information, an indicator of biometric authentication, and a time varying value in response to valid authentication of the first biometric information, and to provide the one or more signals including the first authentication information for transmitting to a second device; and

## '137 Patent Claim 12[e]:

based on the first biometric, and 4) generate one or more signals including first authentication information, an indicator of biometric authentication of the user of the first device, and a time varying value; and

# Jakobsson's Unitary Authentication Code Does All Three Types of Required Information (1[e], 12)

- ❖ Petitioner is wrong that Jakobsson's authentication code includes claimed types of information because Jakobsson's system only produces one form of a unitary authentication code 290 (either code 291, 292, or 293) that is created using a transformative "combination function."

## Jakobsson Reference:

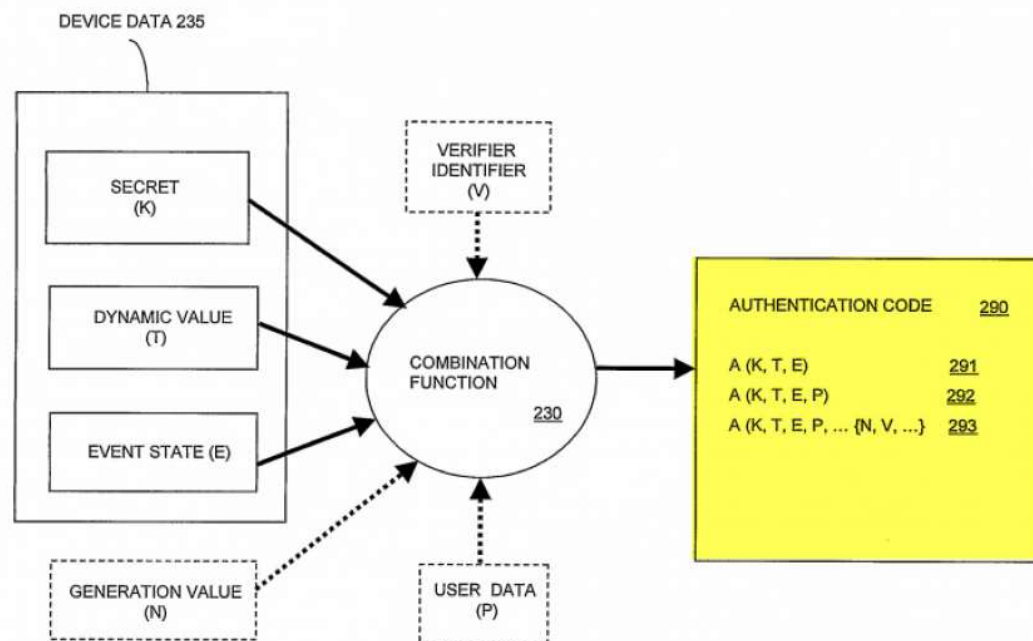
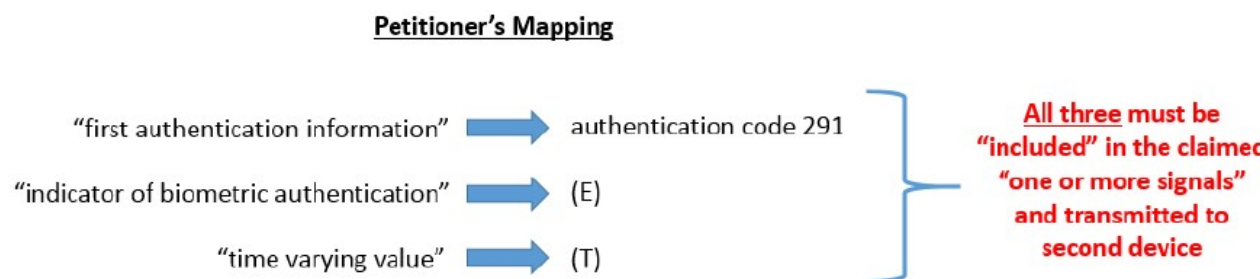


FIG. 2

Ex. 1113 at Fig. 2.

# Jakobsson's Unitary Authentication Code Does Not Contain All Three Types of Required Information (1[e], 12)

- ❖ Petitioner maps the claimed “first authentication information” to “authentication code 291”, the claimed “indicator of biometric authentication” to Jakobsson's “E”, and the claimed “time varying value” to Jakobsson's “T”, but *there is no embodiment within Jakobsson where authentication code 291, E, and T are all transmitted*. PO
- ❖ Rather, as shown in Figure 2 of Jakobsson, only a *unitary authentication code 290* (one form being code 291) is transmitted. Petitioner is therefore not counting inputs used to create authentication code 291 and the code 291 as separate signals in an attempt to read on the challenged claims. PO



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