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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 IPR2018-00813

U.S. Patent No. 9,100,826

PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 1, 2, 7, 8, 10, 11, 14, 15, 21, 22, 24, 26, 27, 30, 31, AND 34

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I. INTRODUCTION

The '826 patent is generally directed to systems and methods for authenticating users based on biometric information. The patent owner, Universal Secure Registry, LLC ("USR"), has described the claimed invention similarly, asserting that the '826 patent relates to "an improved distributed authentication system that authenticates a user's identity at a handheld device using local biometric information, and also remotely authenticates at a second device based on authentication information (e.g., a variable one-time token) determined from the user's biometric information." Plaintiff's Answer Brief in Opposition to Defendants' Motion to Dismiss ("Opp."), 13 (Ex-1109). USR identifies two "critical" claim elements: "(1) gathering biometric information while locally authenticating the user, preventing unauthorized use of the device; and (2) requiring additional remote user authentication by a second device, based on both authentication information (e.g., one-time variable token) received from the first device, and second authentication information." Opp., 15.

When the '826 patent was filed, however, authentication of a user's identity based on (1) a local biometric authentication, and (2) a remote user authentication, based on a one-time variable token and a second authentication information, were well known in the art. In fact, the prior art is replete with disclosures of systems and methods that perform user authentication in this manner. For example, prior

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