**UNITED STATES PATENT AND TRADEMARK OFFICE**
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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**
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APPLE INC.
*Petitioner*,

v.

UNIVERSAL SECURE REGISTRY LLC
*Patent Owner*

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Case IPR2018-00813
U.S. Patent No. 9,100,826

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**PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY**

# TABLE OF CONTENTS

## PATENT OWNER'S LIST OF EXHIBITS

| | |
|---|---|
| Ex. 2001 | Declaration ISO Motion Pro Hac Vice Harold Barza. |
| Ex. 2002 | Declaration ISO Motion Pro Hac Vice Jordan Kaericher. |
| Ex. 2101 | Declaration of Dr. Markus Jakobsson ISO Patent Owner's Response. |
| Ex. 2102 | Curriculum Vitae of Dr. Markus Jakobsson. |
| Ex. 2103 | Transcript of December 14, 2018 Deposition of Dr. Victor John Shoup. |
| Ex. 2104 | N. Asokan, et. al, The State of the Art in Electronic Payment Systems, IEEE Computer, Vol. 30, No. 9, pp. 28-35 (IEEE Computer Society Press, Sept. 1997). |
| Ex. 2105 | M. Baddeley, Using E-Cash in the New Economy: An Economic Analysis of Micropayment Systems, J. Electronic Commerce Research, Vol. 5, No. 4, pp. 239-253 (Nov. 2004). |
| Ex. 2106 | U.S. Application No. 14/027,860. |
| Ex. 2107 | U.S. Application No. 11/677,490. |
| Ex. 2108 | U.S. Provisional Application No. 60/775,046. |
| Ex. 2109 | U.S. Provisional Application No. 60/812,279. |
| Ex. 2110 | U.S. Provisional Application No. 60/859,235. |
| Ex. 2111 | Declaration by Dr. Markus Jakobsson ISO Motion to Amend. |
| Ex. 2112 | U.S. District Court for Delaware Report and Recommendation. |

| Ex. 2113 | Declaration by Dr. Markus Jakobsson ISO Reply to MTA Opposition. |
|---|---|
| Ex. 2114 | Rough transcript of deposition of Dr. Ari Juels. |
| Ex. 2115 | Juels and Hubaux, "Privacy Is Dead; Long Live Privacy," Communications of the ACM, Vol. 59, No. 6 (June 2016)) |
| Ex. 2116 | Brainard, Juels, et. al., A New Two-Server Approach for Authentication with Short Secrets (Apr. 9, 2003). |

Patent Owner Universal Secure Registry, L.L.C. ("PO") submits this Sur-Reply in opposition to Apple Inc.'s ("Petitioner") Reply (Paper 24, "Reply") to PO's Response (Paper 18, "Response"). Petitioner has failed to prove the challenged claims are invalid for at least four reasons.

First, Petitioner has failed to demonstrate International Patent Application Publication No. WO 2004/051585 ("Jakobsson") (Ex-1104) discloses "retrieves or receives" second authentication information (claims 1-20) because Jakobsson neither *receives nor retrieves* second authentication information; rather, it *creates* such information. "Creating" is a fundamentally different concept from "receiving or retrieving," and Petitioner effectively asks the Board to rewrite the claim language ("retrieves or receives or creates") to make up for Jakobsson's shortcoming. It should decline to do so.

Second, Petitioner has failed to prove Jakobsson in view of U.S. Patent Application Publication No. 2004/0236632 ("Maritzen") (Ex-1105) disclose the limitation of enabling or disabling (cl. 7, 14, 26 and 24), or that a POSITA would be motivated to make such a combination. Further, Petitioner has failed to prove Jakobsson discloses "compar[ing]" stored authentication information, or that a POSITA would combine Jakobsson with International Patent Application Publication No. WO 2005/001751 ("Verbauwhede") (Ex-1107).

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