

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VISA INC. and VISA USA, INC.,
Petitioners,

v.

UNIVERSAL SECURE REGISTRY LLC,
Patent Owner.

Case No. IPR2018-01350
Patent No. 8,856,539

SECOND DECLARATION OF JUSTIN DOUGLAS TYGAR, PH.D.

TABLE OF CONTENTS

I.	SCOPE OF WORK.....	1
II.	LEGAL STANDARDS	2
III.	USR’S PROPOSED CLAIM AMENDMENTS	5
IV.	SUBSTITUTE CLAIMS 39-52 OF THE ’539 PATENT LACK SUFFICIENT WRITTEN DESCRIPTION SUPPORT.....	14
A.	USR’s proposed claim limitations 39[c], 48[a], 51[d], and 52[pre] regarding a lack of communication between the secure registry system and the entity lack written description support.	14
B.	USR’s proposed claim limitations 46[b] and 52[c] regarding an identity of an entity having been verified using a biometric lack sufficient written description support.	20
C.	USR’s proposed claim limitations 40[b] and 46[d] regarding mapping the time-varying multicharacter code to an identity of the entity using the time-varying multicharacter code and the time value lacks sufficient written description support.	23
D.	USR’s proposed claim limitation 51[b] regarding a training process by establishing communications between the secure registry system and the entities lacks sufficient written description support.	25
V.	SUBSTITUTE CLAIMS 39-52 ARE OBVIOUS IN VIEW OF THE PRIOR ART.....	27
A.	The prior art discloses receiving from the provider a transaction request	29
B.	The prior art discloses receiving the transaction request without communication or after terminating communications between the secure registry system with the entity	31
C.	The prior art discloses validating an identity of the provider	33
D.	The prior art discloses the identity of the entity is verified using a biometric.....	34

E.	The prior art discloses the transaction request further including a time value representative of when the time-varying multicharacter code was generated and extracting the time value from the transaction request.....	37
F.	The prior art discloses mapping the time-varying multicharacter code to an identity of the entity using the time-varying multicharacter code and the time value	39
G.	The prior art discloses the secure data stored at the database during a training process by establishing communications between the secure registry system and the entities	42
H.	The prior art discloses providing the account identifying information to a third party that uses the public ID code to obtain the financial account number associated with the entity to enable or deny the transaction without providing the account identifying information to the provider	44
I.	Substitute claim 51 is obvious in view of Brener, Desai, and Weiss.	47
J.	Substitute claims 39, 41-45, and 52 are obvious in view of Brener, Desai, Weiss, and Pare.	56
K.	Substitute claims 39, 40 and 46-50 are obvious in view of Brener, Desai, Schneier, and Pare.....	72
VI.	THE SUBSTITUTE CLAIMS 39-52 ARE INELIGIBLE UNDER 35 U.S.C. § 101.....	86
A.	<i>Alice</i> Step 1: The Substitute Claims Are Directed to an Abstract Idea.....	87
B.	<i>Alice</i> Step 2: The remaining limitations of the substitute claims add nothing inventive to the abstract idea.	89
VII.	THE PROPOSED SUBSTITUTE CLAIMS ARE INDEFINITE	91
A.	The phrase “for providing information to a provider...without providing account identifying information to the provider” is indefinite	91

B. The added limitations “validate” and “verify” are indefinite.91

VIII. CONCLUDING STATEMENTS.....92

APPENDIX A – LIST OF EXHIBITS93

I, Justin Douglas Tygar, declare as follows:

I. SCOPE OF WORK

1. I have been retained by Visa Inc. and Visa USA, Inc. (together, “Visa”) to offer an expert opinion on the validity of certain claims of the ’539 patent. I have previously provided testimony in connection with this matter in the form of a declaration submitted on July 3, 2018 (Ex-1002) and a deposition taken on April 19, 2019.

2. My qualifications are set forth in my first declaration, Ex-1002, at paragraphs 2-10.

3. Ex-1002 at Appendix A lists the materials I previously reviewed. I also reviewed and considered various other documents in arriving at my opinions set forth herein and cite some of them in this declaration. Appendix B lists the additional documentation that I considered in arriving at my opinions.

4. Visa pays the consulting firm DOAR \$700 per hour for my services.

5. I previously set forth my understanding and opinions pertaining to a person of ordinary skill in the art in the relevant field in my first declaration, Ex-1002, at paragraphs 41-46.

6. Dr. Jakobsson and I disagree about the appropriate level of skill in the art. *See* Ex-2001 at ¶¶14-16; Ex-1002 at ¶¶41-46. In my opinion, the differences

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