

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

CPC PATENT TECHNOLOGIES PTY, LTD.,
Patent Owner

Inter Partes Review Case No. IPR2022-00600

U.S. Patent No. 8,620,039

DECLARATION OF DR. ANDREW SEARS

IPR2022-00600

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1. *Claim 1(Pre): “A method of enrolling in a biometric card pointer
system, the method comprising the steps of”*40

2. *Claim 1(a): “receiving card information”*46

3. *Claim 1(b): “receiving the biometric signature”*49

4. *Claim 1(c): “defining, dependent upon the received card information, a
memory location in a local memory external to the card”*52

5. *Claim 1(d): “determining if the defined memory location is unoccupied”*
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6. *Claim 1(e): “storing, if the memory location is unoccupied, the biometric
signature at the defined memory location.”*78

B. CLAIM 2.....79

1. *Claim 2(Pre): “A method of obtaining verified access to a process, the
method comprising the steps of:”*79

2. Claim 2(a): “storing a biometric signature according to the enrolment method of claim 1;”80

3. Claim 2(b): “verifying the subsequently presented presentation of the card information and the biometric signature if the subsequently presented biometric signature matches the biometric signature at the memory location, in said local memory, defined by the subsequently presented card information.”80

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1. Claim 19(Pre): “A non-transitory computer readable medium having recorded thereon a computer program for directing a processor to execute a method of enrolling in a biometric card pointer system, the program comprising”82

2. Claim 19(a): “code for receiving card information”86

3. Claim 19(b): “code for receiving the biometric signature”87

4. Claim 19(c): “code for defining, dependent upon the received card information, a memory location in a local memory external to the card”87

5. Claim 19(d): “code for determining if the defined memory location is unoccupied”87

6. Claim 19(e): “code for storing, if the memory location is unoccupied, the biometric signature at the defined memory location.”87

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1. Claim 20(Pre): “A non-transitory computer readable medium having recorded thereon a computer program for directing a processor to execute a method of obtaining verified access to a process, the program comprising:”87

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4. Claim 20(c): “code for verifying the subsequently presented card information if the subsequently presented biometric signature matches the biometric signature at the memory location, in said local memory, defined by the subsequently presented card information”88

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