

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

CPC PATENT TECHNOLOGIES PTY, LTD.,

Case IPR2022-00600

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

**PETITIONER REPLY
TO PATENT OWNER RESPONSE**

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I. INTRODUCTION

The *Bradford-Foss-Yamane* Ground requires two minimal modifications to *Bradford* to render obvious the challenged claims. First, *Bradford's* enrollment method is clarified, per *Foss*, to specify card information is received during the *enrollment* process. Second, *Bradford* is clarified, per *Yamane*, to utilize a fingerprint presence/absence flag to determine if a biometric signature was previously stored.

Because the *Bradford-Foss-Yamane* Ground presents a strong showing of obviousness, CPC resorts to primarily arguing a claim construction of the term “defining” in the challenged independent claims. CPC’s construction is without intrinsic or extrinsic support and is inconsistent with all embodiments described in the ’039 Patent. CPC’s remaining arguments rely on attorney argument or conclusory declarant opinions that do not address the Petition’s mapping or the references’ complete teachings.

II. CPC’S CONSTRUCTION OF “DEFINING...A MEMORY LOCATION” IS ERRONEOUS

CPC contends “defining...a memory location” means “setting” or “establishing” a memory location. (Paper 12, 7-8). CPC manufactures this unsupported construction in an attempt to circumvent *Bradford's* teachings. As mapped in the Petition, *Bradford* teaches creating, during enrollment of a player, a player ID entry that includes a unique identifier associated with the player, where

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