K&L GATES

Apple, Inc. v. CPC Patent Technologies Pty Ltd.
IPR2022-00600

Patent Owner's Slides

Hearing – July 18, 2023

"Defining"

'039 Patent Claim 1

1. A method of enrolling in a biometric card pointer system, the method comprising the steps of:
   receiving card information;
   receiving the biometric signature;
   defining, dependent upon the received card information, a memory location in a local memory external to the card;
   determining if the defined memory location is unoccupied; and
   storing, if the memory location is unoccupied, the biometric signature at the defined memory location.

Ex. 1001, Claim 1

Dr. Sears

Q. So, again, just to repeat my q

obtain card information, first; defin

location based on that information, s

the biometric signature at that defin

location, third.

      That is the order that things

Claim 1, right?

      A. I believe that is the order in

things need to happen.

Ex. 2004 at 14:2-10

Source: Sur-Reply at 2

Bradford

Ex. 1004

Dr. Sears

> Q. If the first authenticator is a
>
> card that's generated by the casino, t
>
> entry is created first, and the first
>
> authenticator is then created and prov
>
> user; is that right?
>
> A. I believe from the reading of t
>
> about -- that sounds accurate.

Ex. 2004 at 31:12-18

Apple's Belated Construction

As mapped in the Petition, a proper understanding of the claime

"defining, dependent upon the received card information, a memory loc

pointing to, dependent upon[1] the received card information, a memory loca

Reply at 3

Claim Term	Agreed Plain & Ordinary Construction
Claims 1, 19: "dependent upon"	Plain and ordinary meaning, defined as "contingent determined by" (Ex. 1032, 2)

The District Court also construed "biometric card pointer system,"

Claims 1 and 19, as a "[n]onlimiting preamble term with no patentable we

Petition at 6

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