#### 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. IPR2022-00601

U.S. Patent No. 9,269,208

#### **DECLARATION OF DR. ANDREW SEARS**

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		I: OPINIONS REGARDING THE COMBINATION <i>IIASSEN, MCKEETH</i> , AND <i>ANDERSON</i>	)
A.	CLA	м 10	)
	1.	Claim 10(Pre1): "A method for providing secure access to a controlled item in a system comprising"	)
	2.	Claim 10(Pre2): "a database of biometric signatures" 85	,
	3.	Claim 10(Pre3): "a transmitter subsystem comprising a biometric sensor for receiving a biometric signal, and means for emitting a secure access signal capable of granting more than two types of access to the controlled item"	)
	4.	Claim 10(Pre4): "a receiver sub-system comprising means for receiving the transmitted secure access signal, and"	,
	5.	Claim 10(Pre5): "means for providing conditional access to the controlled item dependent upon information in said secure access signal"	ſ
	6.	Claim 10(a): "the method comprising the steps of: populating the database of biometric signatures by"	;
	7.	Claim 10(a1): "receiving a series of entries of the biometric signal"134	t
	8.	Claim 10(a2): "determining at least one of the number of said entries and a duration of each said entry"	)
	9.	Claim 10(a3): "mapping said series into an instruction" 153	•
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	12.	Claim 10(c): "matching the biometric signal against members of the database of biometric signatures to thereby output an accessibility attribute"	}

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	13.	Claim 10(d): "emitting a secure access signal conveying information dependent upon said accessibility attribute" 181	
	14.	Claim 10(e): "providing conditional access to the controlled item dependent upon said information"	
	15.	Claim 10(f): "wherein the controlled item is one of: a locking mechanism of a physical access structure or an electronic lock on an electronic computing device"	
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	CLAIN	A 11: "THE METHOD ACCORDING TO CLAIM 10, WHEREIN THE STEP OF POPULATING THE DATABASE OF BIOMETRIC SIGNATURES FURTHER COMPRISES THE STEP OF ENROLLING A BIOMETRIC SIGNATURE INTO THE DATABASE OF BIOMETRIC SIGNATURES COMPRISING THE STEPS OF: RECEIVING A BIOMETRIC SIGNAL; AND ENROLLING THE BIOMETRIC SIGNAL AS AN ADMINISTRATOR SIGNATURE IF THE DATABASE OF BIOMETRIC SIGNATURES IS EMPTY." 187	
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	2.	Claim 1(a): "a database of biometric signatures"	
	3.	Claim 1(b): "a transmitter subsystem comprising:"	
	4.	Claim 1(b1): "a biometric sensor for receiving a biometric signal"	
	5.	Claim 1(b2): "means for matching the biometric signal against members of the database of biometric signatures to thereby output an accessibility attribute"	

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6.	Claim 1(b3): "means for emitting a secure access signal conveying information dependent upon said accessibility attribute"	101
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7.	Claim 1(c): "a receiver subsystem comprising" 1	94
8.	Claim 1(c1): "means for receiving the transmitted secure access signal" 1	94
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