

Exhibit B-15 to HMD’s Invalidation Contentions
Comparison of U.S. Patent No. 9,665,705 and U.S. Patent Application Publication No.
 (“Mathiassen”)

As described in the following claim chart, asserted claims 1, 10, 11, and 15-17 of U.S. Patent No. 9,665,705 (“’705”) in view of U.S. Patent Application Publication No. 2004/0123113 (“Mathiassen”), alone or in combination with other prior art references and other arguments identified in HMD’s Invalidation Contentions, including, without limitation, as set forth in the chart below.

Mathiassen was filed on December 18, 2002 and published on June 24, 2004. Mathiassen is accordingly prior art under at least pre-AIA § 102(e). Mathiassen anticipates or renders obvious, alone or in combination with other prior art, each of the Asserted Claims of the ’705 patent as described in the chart below and in the main Invalidation Contentions chart is annexed.

Nothing in these claim charts should be construed as an admission regarding infringement, either literally or under the doctrine of equivalents, or as an admission regarding HMD’s understanding of the proper scope of the Asserted Claims. Given the Plaintiff’s infringement contentions, the exemplary citations herein necessarily account for a variety of possible prior art and claim constructions, including the claim constructions and interpretations apparently advanced by Plaintiff.

To the extent Plaintiff contends that Mathiassen fails to disclose, teach, or suggest one or more of the claim elements, it would be obvious to combine Mathiassen with one or more of the prior art references listed in HMD’s Invalidation Contentions element-by-element in Exhibit C, and with the knowledge of a person of ordinary skill in the art, to render the asserted claims obvious. As included in the following claim chart, it would be obvious to combine Mathiassen with at least the following prior art references or in combination with each other:

- U.S. Patent No. 6,877,097 (“Hamid”)
- U.S. Patent No. 7,404,486 (“Sands”)
- U.S. Patent No. 7,697,729 (“Howell”)
- U.S. Patent Pub. No. 2002/0063154 (“Hoyos”)
- U.S. Patent No. 6,766,456 (“McKeeth”)
- U.S. Patent No. 6,983,061 (“Ikegami”)

¹ CPC has indicated that it has dropped previously asserted claims and is now asserting only claims 1, 10, 11, and 15-17 of the ’705 patent. Defendant’s Interrogatory No. 21, served February 24, 2022.

- U.S. Patent No. 5,933,515 (“Pu”)
- PCT Pub. No. WO 2005/043451 (“Steinar”)
- U.S. Patent No. 6,509,847 (“Anderson”)
- U.S. Patent No. 6,088,585 (“Schmitt”)
- U.S. Patent No. 6,219,793 (“Li”)

This claim chart is a part of HMD’s Invalidation Contentions and supports the arguments therein. This claim combination with the arguments provided in HMD’s Invalidation Contentions.

Citations to particular supporting evidence are merely exemplary of where each limitation of each asserted claim is disclosed or taught by Mathiassen and/or other prior art. HMD reserves the right to rely on other evidence of how Mathiassen alone or in combination with other prior art renders the ’705 patent invalid.

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	Mathiassen
1. A system for providing secure access to a controlled item, the system comprising:	To the extent the preamble is limiting, Mathiassen discloses a system for providing secure access to a controlled item explicitly, inherently, or as a matter of common sense, or it would be obvious to add missing aspects of the limitation. For example, see the following passages and/or figures, as well as all related disclosures.

Invalidity Claim Chart - U.S. Pat. No. 9,665,705

Claim Element	Mathiassen
	<p style="text-align: center;">Figure 2a</p> <p>Mathiassen at Fig. 2a</p>

Invalidity Claim Chart - U.S. Pat. No. 9,665,705

Claim Element	Mathiassen
	<p style="text-align: right;">Figure 2b</p> <p>Mathiassen at Fig. 2b</p>

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	Mathiassen
	<p style="text-align: center;">Figure 8</p> <p>Mathiassen at Fig. 8</p> <p>“A portable or embedded access device is provided for being coupled to, and for providing authorized users access to, an access-limited apparatus, device, network or system such as a terminal, an internet bank or a corporate or government intranet. The access device includes an integrated circuit (IC) (1) providing increased security by bridging the functional communication between the input from a user and, upon positive authentication of the user's fingerprint locally, the communication with the said access-limited apparatus, device, network or system remote.</p> <p>A corresponding method of using the portable device or the embedded device is disclosed, including providing a bridge from biometrics input to a computer locally, into secure communication responses to a non-biometrics network.</p>

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