Exhibit B-15 to HMD's Invalidity 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 ("'7[...] in view of U.S. Patent Application Publication No. 2004/0123113 ("Mathiassen"), alone or in combination wit[...] references and other arguments identified in HMD's Invalidity Contentions, including, without limitation, as set [...]

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

Nothing in these claim charts should be construed as an admission regarding infringement, either literally or [...] equivalents, or as an admission regarding HMD's understanding of the proper scope of the Asserted Claims. Gi[...] Plaintiff's infringement contentions, the exemplary citations herein necessarily account for a variety of possible in[...] 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 elem[...] would be obvious to combine Mathiassen with one or more of the prior art references listed in HMD's Invalidity C[...] element-by-element in Exhibit C, and with the knowledge of a person of ordinary skill in the art, to render the as[...] As included in the following claim chart, it would be obvious to combine Mathiassen with at least the following r[...] 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")

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[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 pat[...] 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 Invalidity Contentions and supports the arguments therein. This claim c
combination with the arguments provided in HMD's Invalidity Contentions.

Citations to particular supporting evidence are merely exemplary of where each limitation of each asserted clai
disclosed or taught by Mathiassen and/or other prior art. HMD reserves the right to rely on other evidence
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 providir controlled item explicitly, inherently, or as a matter of common sense, or it would to add missing aspects of the limitation. For example, see the following passages and/or figures, as well as all related discl

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	**Mathiassen**
	Mathiassen at Fig. 2a

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	**Mathiassen**
	Mathiassen at Fig. 2b

Invalidity Claim Chart - U.S. Pat. No. 9,665,705	
Claim Element	**Mathiassen**
	Mathiassen at Fig. 8 "A portable or embedded access device is provided for being coupled to, and for authorized users access to, an access-limited apparatus, device, network or system terminal, an internet bank or a corporate or government intranet. The access devic integrated circuit (IC) (1) providing increased security by bridging the functionali input from a user and, upon positive authentication of the user's fingerprint locally communication with the said access-limited apparatus, device, network or system remote. A corresponding method of using the portable device or the embedded device is d providing a bridge from biometrics input to a computer locally, into secure comm responses to a non-biometrics network.

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