


**Claim Chart for U.S. Patent No. 9,665,705 (“the ‘705 Patent”)**


The Accused Instrumentalities include, but are not necessarily limited to, Apple iPhone and Apple iPad compatible with Yale Smart Locks, and any Apple product or device that is substantially or reasonably similar to the functionality set forth below. The Accused Instrumentalities infringe the claims of the ‘705 Patent, as described below, either directly under 35 U.S.C. § 271(a), or indirectly under 35 U.S.C. §§ 271(b)–(c). The Accused Instrumentalities infringe the claims of the ‘705 Patent literally and, to the extent not literally, under the doctrine of equivalents.

<b><u>Claim 1</u></b>	<b><u>Accused Instrumentalities</u></b>
<p>1. A system for providing secure access to a controlled item, the system comprising:</p>	<p><i>To the extent that the preamble is deemed to be a limitation, the Accused Instrumentalities are configured to use a system in accordance with this claim.</i></p> <p>More specifically, the controlled item is a locking mechanism of the door lock of the user’s home. The Accused Instrumentalities are configured to provide secure access to the user’s home via Yale Smart Locks when the user provides biometric signal to the Accused Instrumentalities via Touch ID or Face ID.</p> <p>“When the “Secure Remote Access” feature is turned on, the app will use your phone’s built-in authentication tools to prompt fingerprint or facial recognition before you can unlock or lock your home remotely (note: if your phone does not have these features, it will prompt you to use your PIN code). This further ensures that your door is only operated by the right people at the time you intend for it.”</p> <p>(<a href="https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks/">https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks/</a>)</p>

<u>Claim 1</u>	<u>Accused Instrumentalities</u>
	 <p>(<a href="https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks1/">https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks1/</a>)</p>

<u>Claim 1</u>	<u>Accused Instrumentalities</u>
	 <p>(<a href="https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black">https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black</a>)</p>

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	<p>The Accused Instrumentalities compatible with Yale Smart Locks are shown below:</p> <p><b>Compatibility</b></p> <table border="0"> <thead> <tr> <th data-bbox="863 443 982 461">iPhone Models</th> <th data-bbox="1089 443 1188 461">iPad Models</th> </tr> </thead> <tbody> <tr><td data-bbox="863 469 968 487">iPhone 12 Pro</td><td data-bbox="1089 469 1230 487">iPad Pro 12.9-inch</td></tr> <tr><td data-bbox="863 495 1003 513">iPhone 12 Pro Max</td><td data-bbox="1089 495 1209 513">(5th generation)</td></tr> <tr><td data-bbox="863 521 974 539">iPhone 12 mini</td><td data-bbox="1089 521 1230 539">iPad Pro 12.9-inch</td></tr> <tr><td data-bbox="863 547 940 565">iPhone 12</td><td data-bbox="1089 547 1209 565">(4th generation)</td></tr> <tr><td data-bbox="863 573 968 591">iPhone 11 Pro</td><td data-bbox="1089 573 1230 591">iPad Pro 12.9-inch</td></tr> <tr><td data-bbox="863 599 1003 617">iPhone 11 Pro Max</td><td data-bbox="1089 599 1209 617">(3rd generation)</td></tr> <tr><td data-bbox="863 625 940 643">iPhone 11</td><td data-bbox="1089 625 1230 643">iPad Pro 12.9-inch</td></tr> <tr><td data-bbox="863 651 1066 669">iPhone SE (2nd generation)</td><td data-bbox="1089 651 1209 669">(2nd generation)</td></tr> <tr><td data-bbox="863 677 940 695">iPhone XS</td><td data-bbox="1089 677 1230 695">iPad Pro 12.9-inch</td></tr> <tr><td data-bbox="863 703 978 721">iPhone XS Max</td><td data-bbox="1089 703 1209 721">(1st generation)</td></tr> <tr><td data-bbox="863 729 940 747">iPhone XR</td><td data-bbox="1089 729 1209 747">iPad Pro 11-inch</td></tr> <tr><td data-bbox="863 755 940 773">iPhone X</td><td data-bbox="1089 755 1230 773">(3rd generation)</td></tr> <tr><td data-bbox="863 781 940 799">iPhone 8</td><td data-bbox="1089 781 1209 799">iPad Pro 11-inch</td></tr> <tr><td data-bbox="863 807 968 824">iPhone 8 Plus</td><td data-bbox="1089 807 1209 824">(2nd generation)</td></tr> <tr><td data-bbox="863 833 940 850">iPhone 7</td><td data-bbox="1089 833 1209 850">iPad Pro 11-inch</td></tr> <tr><td data-bbox="863 859 968 876">iPhone 7 Plus</td><td data-bbox="1089 859 1209 876">(1st generation)</td></tr> <tr><td data-bbox="863 885 940 902">iPhone 6s</td><td data-bbox="1089 885 1230 902">iPad Pro 10.5-inch</td></tr> <tr><td data-bbox="863 911 978 928">iPhone 6s Plus</td><td data-bbox="1089 911 1209 928">iPad Pro 9.7-inch</td></tr> <tr><td data-bbox="863 937 1066 954">iPhone SE (1st generation)</td><td data-bbox="1089 937 1276 954">iPad Air (4th generation)</td></tr> <tr><td></td><td data-bbox="1089 963 1276 980">iPad Air (3rd generation)</td></tr> <tr><td></td><td data-bbox="1089 989 1167 1006">iPad Air 2</td></tr> <tr><td></td><td data-bbox="1089 1015 1251 1032">iPad (8th generation)</td></tr> <tr><td></td><td data-bbox="1089 1040 1251 1058">iPad (7th generation)</td></tr> <tr><td></td><td data-bbox="1089 1066 1251 1084">iPad (6th generation)</td></tr> <tr><td></td><td data-bbox="1089 1092 1251 1110">iPad (5th generation)</td></tr> <tr><td></td><td data-bbox="1089 1118 1283 1136">iPad mini (5th generation)</td></tr> <tr><td></td><td data-bbox="1089 1144 1178 1162">iPad mini 4</td></tr> </tbody> </table> <p><a href="https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black">https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black</a></p>	iPhone Models	iPad Models	iPhone 12 Pro	iPad Pro 12.9-inch	iPhone 12 Pro Max	(5th generation)	iPhone 12 mini	iPad Pro 12.9-inch	iPhone 12	(4th generation)	iPhone 11 Pro	iPad Pro 12.9-inch	iPhone 11 Pro Max	(3rd generation)	iPhone 11	iPad Pro 12.9-inch	iPhone SE (2nd generation)	(2nd generation)	iPhone XS	iPad Pro 12.9-inch	iPhone XS Max	(1st generation)	iPhone XR	iPad Pro 11-inch	iPhone X	(3rd generation)	iPhone 8	iPad Pro 11-inch	iPhone 8 Plus	(2nd generation)	iPhone 7	iPad Pro 11-inch	iPhone 7 Plus	(1st generation)	iPhone 6s	iPad Pro 10.5-inch	iPhone 6s Plus	iPad Pro 9.7-inch	iPhone SE (1st generation)	iPad Air (4th generation)		iPad Air (3rd generation)		iPad Air 2		iPad (8th generation)		iPad (7th generation)		iPad (6th generation)		iPad (5th generation)		iPad mini (5th generation)		iPad mini 4
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1a. a memory comprising a database of biometric signatures;	<i>The Accused Instrumentalities include a memory comprising a database of biometric signatures.</i>																																																								

<u>Claim 1</u>	<u>Accused Instrumentalities</u>
	<p>More specifically, the iPhone allows multiple biometric signatures to be entered into a database on the iPhone:</p> <p><b>Touch ID</b></p> <p>The iPhone allows the registration of multiple fingerprints:</p>  <p>Fig. from <a href="https://support.apple.com/en-us/HT201371">https://support.apple.com/en-us/HT201371</a> under Manage Touch ID Settings. In the second bullet, it literally says:</p> <p>"Register up to five fingerprints."</p> <p>"Touch ID can read multiple fingerprints, and it can read fingerprints in 360-degrees of orientation. It then creates a mathematical representation of your fingerprint and compares this to your enrolled fingerprint data to identify a match and unlock your device. "</p>

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