UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASSA ABLOY AB, ASSA ABLOY Inc., ASSA ABLOY Residential Group, Inc., August Home, Inc., HID Global Corporation, and ASSA ABLOY Global Solutions, Inc., Petitioners,

v.

CPC Patent Technologies PTY LTD., Patent Owner.

> Case No. IPR2022-01006 Patent No. 9,665,705

Before SCOTT A. DANIELS, BARRY L. GROSSMAN, and AMBER L. HAGY, *Administrative Patent Judges*.

PETITIONERS' REPLY TO

PATENT OWNER'S RESPONSE TO PETITION

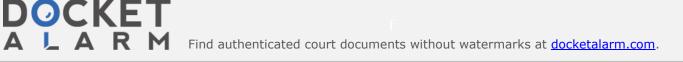


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TABLE OF AUTHORITIES

Cases

Aspex Eyewear, Inc. v Marchon Eyewear, Inc., 672 F.3d 1335 (Fed. Cir. 2012)	12
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CPC Patent Technologies Pty Ltd v. Apple Inc., WDTX-6-21-cv-00165-ADA, Dkt. No. 76	1
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<i>In re Dembiczak</i> , 175 F.3d 994 (Fed. Cir. 1999)	18, 19
<i>INVT SPE LLC v. Int'l Trade Comm'n</i> , 46 F.4th 1361 (Fed. Cir. 2022)	12
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ParkerVision, Inc. v. Qualcomm Inc., 903 F.3d 1354 (Fed. Cir. 2018)	12

IPR2022-01006 U.S. Patent No. 9,665,705

PETITIONERS' EXHIBIT LIST (New Exhibits in *Italics***)**

<u>Exhibit</u>	Description
EX-1001	U.S. Patent No. 9,665,705 ("Burke II")
EX-1002	Patent Prosecution History of U.S. Patent No. 9,665,705
EX-1003	U.S. Patent No. 6,256,737 to Bianco et al. ("Bianco")
EX-1004	World Intellectual Property Organization (WIPO) Int. Pub. No. WO 2002028067A1 (02/28067) to Mathiassen ("Mathiassen")
EX-1005	Declaration of S. Lipoff Regarding Invalidity of U.S. Patent No. 9,665,705
EX-1006	Curriculum Vitae of Stuart Lipoff
EX-1007	U.S. Patent No. 9,269,208 to Burke ("Burke I")
EX-1008	Dawn Xiodong Song, David Wagner, and Xuqing Tian (University of California, Berkeley), "Timing Analysis of Keystrokes and Timing Attacks on SSH," USENIX Security Symposium, vol. 2001 (2001), available at https://people.eecs.berkeley.edu/~daw/papers/ssh-use01.pdf.
EX-1009	Claim Construction Order in CPC Patent Technologies Pty Ltd v. Apple Inc., WDTX-6-21-cv-00165-ADA, Dkt. No. 76 ("Apple CC Order")
EX-1010	Claim Construction Order in <i>CPC Patent Technologies Pty Ltd v.</i> <i>HMD Global Oy</i> , WDTX-6-21-cv-00166-ADA, Dkt. No. 45 ("HMD CC Order")

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