


Claim Chart for U.S. Patent No. 9,269,208 (“the ‘208 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 ‘208 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 ‘208 Patent **literally** and, to the extent not literally, under the doctrine of equivalents.

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

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	 <p>(https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks/)</p>

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

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	<p>The Accused Instrumentalities compatible with Yale Smart Locks are shown below:</p> <p>Compatibility</p> <table border="0"> <thead> <tr> <th data-bbox="856 441 970 457">iPhone Models</th> <th data-bbox="1083 441 1176 457">iPad Models</th> </tr> </thead> <tbody> <tr><td data-bbox="856 467 957 483">iPhone 12 Pro</td><td data-bbox="1083 467 1218 509">iPad Pro 12.9-inch (5th generation)</td></tr> <tr><td data-bbox="856 493 995 509">iPhone 12 Pro Max</td><td data-bbox="1083 518 1218 560">iPad Pro 12.9-inch (4th generation)</td></tr> <tr><td data-bbox="856 526 961 542">iPhone 12 mini</td><td data-bbox="1083 568 1218 610">iPad Pro 12.9-inch (3rd generation)</td></tr> <tr><td data-bbox="856 553 928 570">iPhone 12</td><td data-bbox="1083 618 1218 660">iPad Pro 12.9-inch (2nd generation)</td></tr> <tr><td data-bbox="856 581 957 597">iPhone 11 Pro</td><td data-bbox="1083 669 1218 711">iPad Pro 12.9-inch (1st generation)</td></tr> <tr><td data-bbox="856 609 991 625">iPhone 11 Pro Max</td><td data-bbox="1083 719 1218 761">iPad Pro 11-inch (3rd generation)</td></tr> <tr><td data-bbox="856 636 928 652">iPhone 11</td><td data-bbox="1083 769 1218 812">iPad Pro 11-inch (2nd generation)</td></tr> <tr><td data-bbox="856 664 1058 680">iPhone SE (2nd generation)</td><td data-bbox="1083 820 1218 862">iPad Pro 11-inch (1st generation)</td></tr> <tr><td data-bbox="856 691 932 708">iPhone XS</td><td data-bbox="1083 870 1218 912">iPad Pro 10.5-inch (3rd generation)</td></tr> <tr><td data-bbox="856 719 970 735">iPhone XS Max</td><td data-bbox="1083 920 1218 963">iPad Pro 10.5-inch (2nd generation)</td></tr> <tr><td data-bbox="856 747 932 763">iPhone XR</td><td data-bbox="1083 971 1218 1013">iPad Pro 10.5-inch (1st generation)</td></tr> <tr><td data-bbox="856 774 924 790">iPhone X</td><td data-bbox="1083 1021 1218 1063">iPad Air (4th generation)</td></tr> <tr><td data-bbox="856 802 924 818">iPhone 8</td><td data-bbox="1083 1071 1218 1114">iPad Air (3rd generation)</td></tr> <tr><td data-bbox="856 829 957 846">iPhone 8 Plus</td><td data-bbox="1083 1122 1218 1164">iPad Air 2</td></tr> <tr><td data-bbox="856 857 924 873">iPhone 7</td><td data-bbox="1083 1172 1218 1214">iPad (8th generation)</td></tr> <tr><td data-bbox="856 885 957 901">iPhone 7 Plus</td><td data-bbox="1083 1222 1218 1265">iPad (7th generation)</td></tr> <tr><td data-bbox="856 912 932 928">iPhone 6s</td><td data-bbox="1083 1273 1218 1315">iPad (6th generation)</td></tr> <tr><td data-bbox="856 940 966 956">iPhone 6s Plus</td><td data-bbox="1083 1323 1218 1365">iPad (5th generation)</td></tr> <tr><td data-bbox="856 967 1050 984">iPhone SE (1st generation)</td><td data-bbox="1083 1373 1218 1416">iPad mini (5th generation)</td></tr> <tr><td></td><td data-bbox="1083 1424 1218 1466">iPad mini 4</td></tr> </tbody> </table> <p>https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black</p>	iPhone Models	iPad Models	iPhone 12 Pro	iPad Pro 12.9-inch (5th generation)	iPhone 12 Pro Max	iPad Pro 12.9-inch (4th generation)	iPhone 12 mini	iPad Pro 12.9-inch (3rd generation)	iPhone 12	iPad Pro 12.9-inch (2nd generation)	iPhone 11 Pro	iPad Pro 12.9-inch (1st generation)	iPhone 11 Pro Max	iPad Pro 11-inch (3rd generation)	iPhone 11	iPad Pro 11-inch (2nd generation)	iPhone SE (2nd generation)	iPad Pro 11-inch (1st generation)	iPhone XS	iPad Pro 10.5-inch (3rd generation)	iPhone XS Max	iPad Pro 10.5-inch (2nd generation)	iPhone XR	iPad Pro 10.5-inch (1st generation)	iPhone X	iPad Air (4th generation)	iPhone 8	iPad Air (3rd generation)	iPhone 8 Plus	iPad Air 2	iPhone 7	iPad (8th generation)	iPhone 7 Plus	iPad (7th generation)	iPhone 6s	iPad (6th generation)	iPhone 6s Plus	iPad (5th generation)	iPhone SE (1st generation)	iPad mini (5th generation)		iPad mini 4
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1a. 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>Touch ID</p> <p>The iPhone allows the registration of multiple fingerprints:</p>  <p>Fig. from https://support.apple.com/en-us/HT201371 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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