


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>

<u>Claim 1</u>	<u>Accused Instrumentalities</u>
	 <p data-bbox="604 1128 1848 1193">(https://us.yalehome.com/en/yale-news/blog/latest-blog-posts/introducing-biometric-verification-for-august-and-yale-locks1/)</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="856 443 972 459">iPhone Models</th> <th data-bbox="1083 443 1178 459">iPad Models</th> </tr> </thead> <tbody> <tr><td data-bbox="856 467 957 483">iPhone 12 Pro</td><td data-bbox="1083 467 1220 508">iPad Pro 12.9-inch (5th generation)</td></tr> <tr><td data-bbox="856 492 993 508">iPhone 12 Pro Max</td><td data-bbox="1083 516 1220 557">iPad Pro 12.9-inch (4th generation)</td></tr> <tr><td data-bbox="856 524 963 540">iPhone 12 mini</td><td data-bbox="1083 565 1220 605">iPad Pro 12.9-inch (3rd generation)</td></tr> <tr><td data-bbox="856 548 926 565">iPhone 12</td><td data-bbox="1083 613 1220 654">iPad Pro 12.9-inch (2nd generation)</td></tr> <tr><td data-bbox="856 573 957 589">iPhone 11 Pro</td><td data-bbox="1083 662 1220 703">iPad Pro 12.9-inch (1st generation)</td></tr> <tr><td data-bbox="856 597 993 613">iPhone 11 Pro Max</td><td data-bbox="1083 711 1220 751">iPad Pro 11-inch (3rd generation)</td></tr> <tr><td data-bbox="856 621 926 638">iPhone 11</td><td data-bbox="1083 760 1220 800">iPad Pro 11-inch (2nd generation)</td></tr> <tr><td data-bbox="856 646 1056 662">iPhone SE (2nd generation)</td><td data-bbox="1083 808 1220 849">iPad Pro 11-inch (1st generation)</td></tr> <tr><td data-bbox="856 670 926 686">iPhone XS</td><td data-bbox="1083 857 1220 898">iPad Pro 10.5-inch (3rd generation)</td></tr> <tr><td data-bbox="856 695 972 711">iPhone XS Max</td><td data-bbox="1083 906 1220 946">iPad Pro 10.5-inch (2nd generation)</td></tr> <tr><td data-bbox="856 719 926 735">iPhone XR</td><td data-bbox="1083 954 1220 995">iPad Pro 10.5-inch (1st generation)</td></tr> <tr><td data-bbox="856 743 926 760">iPhone X</td><td data-bbox="1083 1003 1220 1044">iPad Pro 9.7-inch (4th generation)</td></tr> <tr><td data-bbox="856 768 926 784">iPhone 8</td><td data-bbox="1083 1052 1220 1092">iPad Air (3rd generation)</td></tr> <tr><td data-bbox="856 792 957 808">iPhone 8 Plus</td><td data-bbox="1083 1101 1157 1125">iPad Air 2</td></tr> <tr><td data-bbox="856 816 926 833">iPhone 7</td><td data-bbox="1083 1133 1241 1174">iPad (8th generation)</td></tr> <tr><td data-bbox="856 841 957 857">iPhone 7 Plus</td><td data-bbox="1083 1182 1241 1222">iPad (7th generation)</td></tr> <tr><td data-bbox="856 865 926 881">iPhone 6s</td><td data-bbox="1083 1230 1241 1271">iPad (6th generation)</td></tr> <tr><td data-bbox="856 889 972 906">iPhone 6s Plus</td><td data-bbox="1083 1279 1241 1320">iPad (5th generation)</td></tr> <tr><td data-bbox="856 914 1056 930">iPhone SE (1st generation)</td><td data-bbox="1083 1328 1272 1369">iPad mini (5th generation)</td></tr> <tr><td></td><td data-bbox="1083 1377 1157 1401">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 Pro 9.7-inch (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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