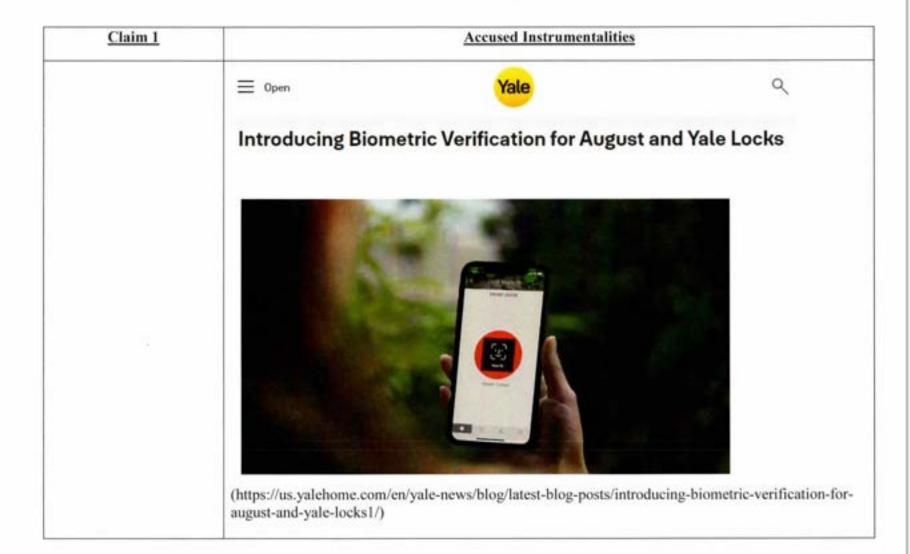
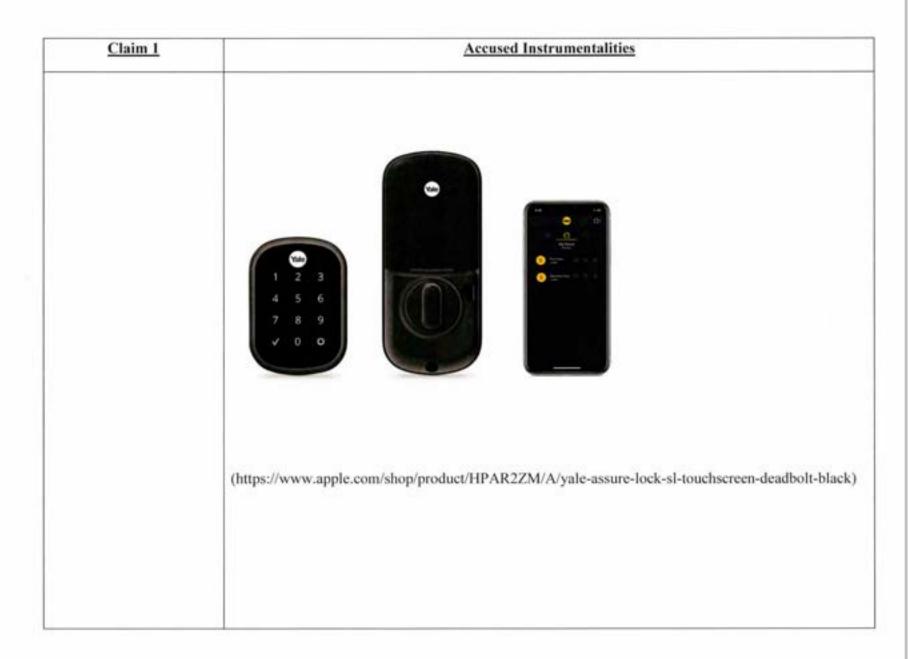
Claim Chart for U.S. Patent No. 9,665,705 ("the '705 Patent")

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.

Claim 1	Accused Instrumentalities
A system for providing secure access to a controlled item, the system comprising:	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.
	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.
	"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/)





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<u>Claim 1</u>	Accused Instrumentalities
	The Accused Instrumentalities compatible with Yale Smart Locks are shown below:
	Compatibility
	iPhone 12 Pro iPhone 12 Pro Max iPhone 12 Pro Max iPhone 12 Pro Max iPhone 12 mini iPhone 12 mini iPhone 12 mini iPhone 11 Pro iPhone 11 Pro iPhone 11 Pro Max iPhone 11 Pro Max iPhone 11 Pro Max iPhone 11 iPhone 11 iPhone 11 iPhone 11 iPhone 11 iPhone SE (2nd generation) iPhone SE (2nd generation) iPhone XS iPhone XS iPhone XS iPhone XS iPhone XS iPhone XR iPhone
1a. a memory comprisin a database of biometri signatures;	g The Accused Instrumentalities include a memory comprising a database of biometric signatures.

Claim 1	Accused Instrumentalities
	More specifically, the iPhone allows multiple biometric signatures to be entered into a database on the iPhone: Touch ID
	The iPhone allows the registration of multiple fingerprints:
	Fig. from https://support.apple.com/en-us/HT201371 under Manage Touch ID Settings. In the second bullet, it literally says: "Register up to five fingerprints."
	"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."

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