


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="1087 441 1180 457">iPad Models</th> </tr> </thead> <tbody> <tr><td data-bbox="856 467 961 483">iPhone 12 Pro</td><td data-bbox="1087 467 1222 506">iPad Pro 12.9-inch (5th generation)</td></tr> <tr><td data-bbox="856 493 991 509">iPhone 12 Pro Max</td><td data-bbox="1087 516 1222 555">iPad Pro 12.9-inch (4th generation)</td></tr> <tr><td data-bbox="856 519 961 535">iPhone 12 mini</td><td data-bbox="1087 565 1222 604">iPad Pro 12.9-inch (3rd generation)</td></tr> <tr><td data-bbox="856 545 928 561">iPhone 12</td><td data-bbox="1087 613 1222 652">iPad Pro 12.9-inch (2nd generation)</td></tr> <tr><td data-bbox="856 571 961 587">iPhone 11 Pro</td><td data-bbox="1087 662 1222 701">iPad Pro 12.9-inch (1st generation)</td></tr> <tr><td data-bbox="856 597 991 613">iPhone 11 Pro Max</td><td data-bbox="1087 711 1222 750">iPad Pro 11-inch (3rd generation)</td></tr> <tr><td data-bbox="856 623 928 639">iPhone 11</td><td data-bbox="1087 760 1222 799">iPad Pro 11-inch (2nd generation)</td></tr> <tr><td data-bbox="856 649 1054 665">iPhone SE (2nd generation)</td><td data-bbox="1087 808 1222 847">iPad Pro 11-inch (1st generation)</td></tr> <tr><td data-bbox="856 675 928 691">iPhone XS</td><td data-bbox="1087 857 1222 896">iPad Pro 10.5-inch (3rd generation)</td></tr> <tr><td data-bbox="856 701 970 717">iPhone XS Max</td><td data-bbox="1087 906 1222 945">iPad Pro 10.5-inch (2nd generation)</td></tr> <tr><td data-bbox="856 727 928 743">iPhone XR</td><td data-bbox="1087 954 1222 993">iPad Pro 10.5-inch (1st generation)</td></tr> <tr><td data-bbox="856 753 928 769">iPhone X</td><td data-bbox="1087 1003 1222 1042">iPad Air (4th generation)</td></tr> <tr><td data-bbox="856 779 928 795">iPhone 8</td><td data-bbox="1087 1052 1222 1091">iPad Air (3rd generation)</td></tr> <tr><td data-bbox="856 805 961 821">iPhone 8 Plus</td><td data-bbox="1087 1101 1222 1140">iPad Air 2</td></tr> <tr><td data-bbox="856 831 928 847">iPhone 7</td><td data-bbox="1087 1149 1222 1188">iPad (8th generation)</td></tr> <tr><td data-bbox="856 857 961 873">iPhone 7 Plus</td><td data-bbox="1087 1198 1222 1237">iPad (7th generation)</td></tr> <tr><td data-bbox="856 883 928 899">iPhone 6s</td><td data-bbox="1087 1247 1222 1286">iPad (6th generation)</td></tr> <tr><td data-bbox="856 909 970 925">iPhone 6s Plus</td><td data-bbox="1087 1295 1222 1334">iPad (5th generation)</td></tr> <tr><td data-bbox="856 935 1054 951">iPhone SE (1st generation)</td><td data-bbox="1087 1344 1222 1383">iPad mini (5th generation)</td></tr> <tr><td></td><td data-bbox="1087 1393 1222 1432">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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