

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. IPR2022-01089

Patent No. 9,269,208

PETITION FOR *INTER PARTES* REVIEW OF

U.S. PATENT NO. 9,269,208 (CLAIMS 10-13)

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EXHIBIT LIST

EXHIBITS FILED BY PETITIONERS	
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 <i>et al.</i> (“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. 9,269,208
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,” <i>USENIX Security Symposium</i> , vol. 2001 (2001), available at https://people.eecs.berkeley.edu/~daw/papers/ssh-use01.pdf .
EX-1009	Claim Construction Order in <i>CPC Patent Technologies Pty Ltd v. Apple Inc.</i> , 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. HMD Global Oy</i> , WDTX-6-21-cv-00166-ADA, Dkt. No. 45 (“HMD CC Order”)

EX-1011	R. Stockton Gaines, William Lisowski, S. James Press, and Normal Shapiro (Rand), <i>Authentication by Keystroke Timing: Some Preliminary Results</i> , R-2526-NSF, May 1980. (“Gaines”)
EX-1012	Patent Prosecution History of U.S. Patent No. 9,269,208
EX-1013	U.S. Patent No. 5,790,674 to Robert C. Houvener and Ian P. Hoenisch (“Houvener”)
EX-1014	U.S. Patent No. 6,856,237 to Thomas R. Richmond, Suzanne Richmond, and Patrick S. Kochie (“Richmond”)
EX-1015	Fabian Monroe, Michael K. Reiter, and Susanne Wetzel. “Password Hardening Based on Keystroke Dynamics,” <i>Proceedings of the 6th ACM Conference on Computer and Communications Security</i> , November 1999. (“Monrose”)
EX-1017	Excerpts from Longman, <i>Dictionary of American English</i> , 3 rd Edition (2004)
EX-1018	Excerpts from Bloomsbury <i>English Dictionary</i> , 2 nd Edition (2004)
EX-1019	WIPO Patent Pub. No. WO2008113110A1 to Christopher John Burke (“Burke III”).
EX-1020	CPC Infringement Allegations re U.S. Patent No. 9,269,208
EX-1021	CPC Infringement Allegations re U.S. Patent No. 9,665,705

I. INTRODUCTION

Petitioners request *Inter Partes* Review (“IPR”) of claims 10-13 (the “Challenged Claims”) of U.S. Patent No. 9,269,208 (“’208 Patent,” EX-1007), purportedly owned by CPC Patent Technologies Pty Ltd. (“Patent Owner”).

This petition in IPR2022-01089 is being filed concurrently with IPR2022-01045, together challenging all claims of the ’208 Patent. These two petitions (IPR2022-01045/01089) are being filed shortly after a petition in IPR2022-01006, which challenges the claims of the related continuation patent, U.S. 9,665,705 (“the ’705 Patent”). Petitioners request that the schedule, discovery, and hearing of these three IPRs be combined. The claims in the two patents are similar, but unlike the claims in the ’705 Patent, the claims in the ’208 Patent include numerous “means for” terms. Petitioners, therefore, recommend that the Board review IPR2022-01006 first.

II. MANDATORY NOTICES

Real Party-in-Interest: The real parties-in-interest are related entities **ASSA ABLOY AB**, and **ASSA ABLOY Inc.**, and its wholly owned subsidiaries **ASSA ABLOY Residential Group, Inc.**, **August Home, Inc.**, **HID Global Corporation**, and **ASSA ABLOY Global Solutions, Inc.** ASSA ABLOY AB is the ultimate parent of all parties-in-interest. None of the entities mentioned in the Related Matters section below were involved in or offered any assistance to the

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