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

SECOND DECLARATION OF STUART LIPOFF

U.S. PATENT NO. 9,269,208 (CLAIMS 1-17)

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			a. PO Improperly Imports Limitatio Claims			
III.			ERSTANDINGS OF THE LEGAL STAN			
IV.	THE CLAIMS OF THE '705/'208 PATENTS ARE INVALID					
	A.	Bian	Bianco-Mathiassen Teach the Biometric Signal Limitation			
		1.	Mathiassen's teachings are the same as embodiment			
		2.	Mathiassen explicitly teaches analyzing for inputting commands.			
		3.	Bianco teaches analyzing multiple signa inputting commands			
	B.	Bianco-Mathiassen Teaches Mapping Said Series of the Biometric Signals Into an Instruction and Populating the Database According to the Instruction				
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Case No. IPR2022-01089 Patent No. 9,269,208

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 et al. ("Bianco")			
Ex. 1004	World Intellectual Property Organization (WIPO) Int. Pub. No. WO 2002028067A1 (02/28067) to Mathiassen ("Mathiassen")			
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," USENIX Security Symposium, vol. 2001 (2001), available at https://people.eecs.berkeley.edu/~daw/papers/ssh-use01.pdf.			
Ex. 1009	Claim Construction Order in CPC Patent Technologies Pty Ltd v. Apple Inc., WDTX-6-21-cv-00165-ADA, Dkt. No. 76 ("Apple CC Order")			

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Ex. 1010	Claim Construction Order in <i>CPC Patent Technologies Pty Ltd v.</i> <i>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:</i> <i>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 Monrose, Michael K. Reiter, and Susanne Wetzel. "Password Hardening Based on Keystroke Dynamics," <i>Proceedings of the 6th ACM Conference on Computer and</i> <i>Communications Security</i> , November 1999. ("Monrose")
Ex. 1017	Excerpts from Longman, Dictionary of American English, 3 rd Edition (2004)
Ex. 1018	Excerpts from Bloomsbury English Dictionary, 2 nd Edition (2004)
Ex. 1019	PCT Patent Publication WO 2008/113110 A1 to Christopher John Burke
Ex. 1020	CPC Infringement Allegations re U.S. Patent No. 9,269,208

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Ex. 1021	CPC Infringement Allegations re U.S. Patent No. 9,665,705
Ex. 1022	Petitioners' Responses to Patent Owner's Interrogatories
Ex. 1023	Webpage printout - Developing for the app store at <u>https://www.apple.com/app-store/developing-for-the-app-store/</u>
Ex. 1024	Webpage printout - Apple MFi Authorized Manufacturers at <u>https://mfi.apple.com/account/authorized-manufacturers</u>
Ex. 1025	Screenshot from Apple 2022 WWDC Apple Partners at <u>https://www.youtube.com/watch?v=q5D55G7Ejs8</u> (20:27)
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