


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>(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 data-bbox="840 438 1260 1185"> <thead> <tr> <th>iPhone Models</th> <th>iPad Models</th> </tr> </thead> <tbody> <tr><td>iPhone 12 Pro</td><td>iPad Pro 12.9-inch (5th generation)</td></tr> <tr><td>iPhone 12 Pro Max</td><td>iPad Pro 12.9-inch (4th generation)</td></tr> <tr><td>iPhone 12 mini</td><td>iPad Pro 12.9-inch (3rd generation)</td></tr> <tr><td>iPhone 12</td><td>iPad Pro 12.9-inch (2nd generation)</td></tr> <tr><td>iPhone 11 Pro</td><td>iPad Pro 12.9-inch (1st generation)</td></tr> <tr><td>iPhone 11 Pro Max</td><td>iPad Pro 11-inch (3rd generation)</td></tr> <tr><td>iPhone 11</td><td>iPad Pro 11-inch (2nd generation)</td></tr> <tr><td>iPhone SE (2nd generation)</td><td>iPad Pro 11-inch (1st generation)</td></tr> <tr><td>iPhone XS</td><td>iPad Pro 10.5-inch (3rd generation)</td></tr> <tr><td>iPhone XS Max</td><td>iPad Pro 10.5-inch (2nd generation)</td></tr> <tr><td>iPhone XR</td><td>iPad Pro 10.5-inch (1st generation)</td></tr> <tr><td>iPhone X</td><td>iPad Air (4th generation)</td></tr> <tr><td>iPhone 8</td><td>iPad Air (3rd generation)</td></tr> <tr><td>iPhone 8 Plus</td><td>iPad Air 2</td></tr> <tr><td>iPhone 7</td><td>iPad (8th generation)</td></tr> <tr><td>iPhone 7 Plus</td><td>iPad (7th generation)</td></tr> <tr><td>iPhone 6s</td><td>iPad (6th generation)</td></tr> <tr><td>iPhone 6s Plus</td><td>iPad (5th generation)</td></tr> <tr><td>iPhone SE (1st generation)</td><td>iPad mini (5th generation)</td></tr> <tr><td></td><td>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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