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, ASSA ABLOY GLOBAL SOLUTIONS, INC.,
Petitioner,

v.

CPC PATENT TECHNOLOGIES PTY LTD.,
Patent Owner.

Case IPR2022-01093
Patent 8,620,039

PATENT OWNER'S RESPONSE

U.S. PATENT NO. 8,620,039 (CLAIMS 1, 2, 13, 14, 19, and 20)

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EXHIBIT	DESCRIPTION
2001	Affidavit in Support of Patent Owner's Motion for Pro Hac Vice Admission of Steven M. Coyle Pursuant to 37 C.F.R. § 42.10(c)
2002	Affidavit in Support of Patent Owner's Motion for Pro Hac Vice Admission of Nicholas A. Geiger Pursuant to 37 C.F.R. § 42.10(c)
2003	Complaint filed in *CPC Patent Technologies Pty Ltd. v. Apple, Inc.*, No. 6:21-cv-00165 (W.D. Tex., Waco Division) (without exhibits)
2004	Affidavit of Service of Complaint filed in *CPC Patent Technologies Pty Ltd. v. Apple, Inc.*, No. 6:21-cv-00165 (W.D. Tex., Waco Division)
2005	Letter dated October 18, 2021 from Patent Owner's counsel to Yale Residential regarding '705 and '208 Patents with attached claim charts
2006	Letter dated November 4, 2021 from Patent Owner's counsel to Yale Residential
2007	Complaint for declaratory judgment filed in *ASSA ABLOY AB et al. v. CPC Patent Technologies Pty. Ltd. and Charter Pacific Corp Ltd.*, Civ. 3:22-cv-694 (D. Conn.) (without exhibits)
2008	Declaration of Kevin J. Dart filed in *ASSA ABLOY AB et al. v. CPC Patent Technologies Pty. Ltd. and Charter Pacific Corp Ltd.*, Civ. 3:22-cv-694 (D. Conn.) (without exhibits)
2009	Apple Developer Program License Agreement
2010	Email thread between Petitioners and Patent Owner's respective counsel regarding additional discovery
2011	Yale product literature (*Yale Assure Lock Touchscreen with Wi-Fi and Bluetooth*) downloaded from [https://shopyalehome.com/products/yale-assure-lock-touchscreen-with-wi-fi-and-bluetooth?variant=39341913079940]
2012	Yale product literature (*Yale Access Upgrade Kit with Wi-Fi for Assure Locks*) downloaded from [https://shopyalehome.com/products/yale-access-ugrade-kit-for-assure-locks-with-wifi?variant=34110396006532]
2013	Yale product literature (*Facial and Fingerprint Lock Verification for Yale Assure Smart Locks*) downloaded from [https://shopyalehome.com/blogs/yale-home-blog/new-facial-and-fingerprint-lock-verification-for-yale-assure-smart-locks]

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