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 SURREPLY

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

TABLE OF CONTENTS

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]

EXHIBIT	DESCRIPTION
2014	August product literature (*August Smart Lock Pro + Connect*) downloaded from [https://august.com/products/august-smart-lock-pro-connect]
2015	August product literature (*New Biometric Verification Feature for August Smart Locks*) downloaded from [https://august.com/blogs/home/introducing-biometric-verification-for-august-and-yale-locks]
2016	Apple literature regarding MiFi Program downloaded from https://mfi.apple.com/
2017	Apple literature regarding MiFi Program (*How the Program Works*) downloaded from https://mfi.apple.com/en/how-it-works.html.
2018	Apple literature regarding MiFi Program (*Frequently Asked Questions*) downloaded from https://mfi.apple.com/en/faqs.html.
2023	Apple Inc. iPhone SDK Agreement (dated 10/20/2008)
2024	Yale Access on the Apple App Store
2025	August Home on the Apple App Store
2026	Apple literature regarding Apple HomeKit ("Developing apps and accessories for the home") downloaded from https://developer.apple.com
2027	Apple literature regarding Apple HomeKit and Yale Assure Lock Yale product literature (*Yale Assure Lock SL Touchscreen Deadbolt – Black – Apple)* downloaded from https://www.apple.com/shop/product/HPAR2ZM/A/yale-assure-lock-sl-touchscreen-deadbolt-black
2028	August product literature regarding Apple HomeKit (*HomeKit FAQ*) downloaded from https://support.august.com/august-smart-lock-homekit-enabled-faq-rJv088y0_z
2029	Declaratory Judgment Plaintiffs' Opposition to Defendants' Motion to Dismiss filed in *CPC Patent Technologies Pty Ltd. v. Apple, Inc.*, No. 6:21-cv-00165 (W.D. Tex., Waco Division)
2030	ASSA ABLOY Global Solutions: Mobile Access for Hotels
2031	HID Global: Mobile Access Solutions
2032	Petitioners' Responses to Patent Owner's Interrogatories (Nos. 1-5) (Petitioners' Ex. 1022 in IPR2022-01006)

EXHIBIT	DESCRIPTION
2033	"Developing for the App Store" Website Page available at https://www.apple.com/app-store/developing-for-the-app-store/ (Petitioners' Ex. 1023 in IPR2022-01006)
2034	Apple MFi Authorized Manufacturers Website Page available at https://mfi.apple.com/account/authorized-manufacturers (Petitioners' Ex. 1024 in IPR2022-01006)
2035	Screenshot from Apple 2022 WWDC Apple Partners available at https://www.youtube.com/watch?v=q5D55G7Ejs8 (20:27) (Petitioners' Ex. 1025 in IPR2022-01006)
2036	Apple 2022 WWDC Video Excerpt available at https://www.youtube.com/watch?v=q5D55G7Ejs8 (Petitioners' Ex. 1026 in IPR2022-01006)
2037	HID Global Android Apps on Google Play available at https://play.google.com/store/search?q=HID%20global&c=apps&hl=en_US (Petitioners' Ex. 1027 in IPR2022-01006)
2038	Petitioners' and Patent Owner's Joint Email Correspondence to the Board dated October 18, 2022 (Submitted in related IPR2022-01006, 01045, 01089)
2039	Declaration of Samuel Russ, Ph.D.
2040	CV of Samuel Russ, Ph.D.
2041	Deposition of Stuart Lipoff (April 27, 2023)
2042	Reserved
2043	Reserved
2044	A. K. Jain, Lin Hong, S. Pankanti and R. Bolle, "An identity-authentication system using fingerprints," in *Proceedings of the IEEE*, vol. 85, no. 9, pp. 1365-1388, Sept. 1997 ("Jain")
2045	Excerpts from Microsoft Computer Dictionary, 5th Ed. (2002).
2046	(COMP 2401 Course Notes, Found at http://people.scs.carleton.ca/~mjhinek/W13/COMP2401/notes/Arrays_and_Pointers.pdf, accessed on 5/8/2023)
2047	Logical Block Addressing (October 20, 2002) (via Wayback Machine)
2048	Bad Block Definition by The Linux Information Project (July 5, 2005)
2049	Deposition of Stuart Lipoff, vol. 2 (August 30, 2023)

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.

fastcase
Smarter legal research.