UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,

Petitioner,

v.

PROXENSE, LLC,

Patent Owner.

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Case No. IPR2024-01335

U.S. Patent No. 9,298,905

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**PETITION FOR *INTER PARTES* REVIEW**

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A. Overview of Prior Art Ludtke ..... 5

B. Claims ..... 8

1. Independent claim 1 ..... 8

a. [1preamble]: "A method comprising:" ..... 8

b. [1a]: "persistently storing biometric data of a legitimate user and an ID code on an integrated device" ..... 9

c. [1b]: "responsive to receiving a request for a biometric verification of a user, receiving, from a biometric sensor, scan data from a biometric scan performed by the biometric sensor;" ..... 12

d. [1c]: "comparing the scan data to the biometric data to determine whether the scan data matches the biometric data;" ..... 13

e. [1d]: "responsive to a determination that the scan data matches the biometric data, wirelessly sending the ID code for comparison by a third-party trusted authority against one or more previously registered ID codes maintained by the third-party trusted authority; and" ..... 13

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f. [1e]: "responsive to receiving an access message from the third-party trusted authority indicating that the third-party trusted authority successfully authenticated the ID code, allowing the user to complete a financial transaction." .....21

2. Claim 3: "The method of claim 1, wherein an indication that the biometric verification was successful is sent with the ID code." .....23

3. Claim 4: "The method of claim 1, wherein the biometric data includes data from one or more of a fingerprint, palm print, a retinal scan, an iris scan, a hand geometry, a facial recognition, a signature recognition and a voice recognition." .....24

4. Claim 5: "The method of claim 1, wherein the integrated device comprises one or more of a mobile phone, tablet, laptop, mp3 player, mobile gaming device, watch and a key fob." .....24

5. Claim 6: "The method of claim 1, wherein completing the financial transaction includes accessing an application":.....27

6. Claim 7: "The method of claim 1, wherein completing the financial transaction includes accessing one or more of a casino machine, a keyless lock, an ATM machine, a web site, a file and a financial account." .....28

7. Independent Claim 9 .....29

a. [9preamble]: "An integrated device comprising:".....29

b. [9a]: "a persistent storage media that persistently stores biometric data of a user and an ID code".....29

c. [9b]: "a validation module, coupled to communicate with the persistent storage media, that receives scan data from a biometric scan for comparison against the biometric data, and that sends the ID code for comparison by a third-party

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trusted authority against one or more previously registered ID codes maintained by the third-party trusted authority; and” .....29

d. [9c]: “a radio frequency communication module that receives an access message from the third-party trusted authority indicating that the third-party trusted authority successfully authenticated the ID code sent to the third-party trusted authority based on the comparison of the ID code and allowing the user to complete a financial transaction.” .....31

8. Claim 10: “The integrated device of claim 7, wherein the ID code is transmitted to the third-party trusted authority over a network.” .....32

9. Claim 12: “The integrated device of claim 7, wherein the integrated device comprises one or more of a mobile phone, tablet, laptop, mp3 player, mobile gaming device, watch and a key fob.” .....33

10. Independent claim 13 .....33

a. [13preamble]: “A system, comprising:” .....33

b. [13a]: “an integrated hardware device that persistently stores biometric data of a legitimate user and an ID code in the integrated hardware device, and that wirelessly sends the ID code;” .....35

c. [13b]: “an authentication circuit that receives the [I]D code and sends the ID code to a third-party trusted authority for authentication, and that receives an access message from the third-party trusted authority indicating that the third-party trusted authority successfully authenticated the ID code and allows the user to complete a financial transaction; and” .....35

d. [13c]: “the third-party trusted authority operated

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by a third party, the third-party trusted authority storing a list of legitimate codes and determining the authentication of the ID code received based on a comparison of the ID code received and the legitimate codes included in the list of the legitimate codes." .....37

11. Claim 14: "The system of claim 11 wherein the integrated hardware device receives an authentication request from the authentication circuit, and in response, requests a biometric scan from a user to generate scan data and, when the integrated hardware device cannot verify the scan data as being from the legitimate user, the integrated hardware device does not send the ID code."..... 37

12. Claim 15: "The system of claim 11, wherein the integrated hardware device comprises one or more of a mobile phone, tablet, laptop, mp3 player, mobile gaming device, watch and a key fob." .....40

13. Claim 16: "The system of claim 11, wherein the biometric data includes data based on one or more of a fingerprint, palm print, a retinal scan, an iris scan, a hand geometry, a facial recognition, a signature recognition and a voice recognition."..... 41

14. Claim 17: "The system of claim 11, wherein completing the financial transaction includes accessing one or more of a casino machine, a keyless lock, an ATM machine, a web site, a file and a financial account." .....41

15. Claim 18: "The system of claim 11, wherein completing the financial transaction includes accessing an application." .....41

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