UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IAPARTMENTS, INC., Petitioner,

v.

EDST, LLC, Patent Owner.

U.S. Patent No. 11,189,118

Post Grant Review of U.S. Patent No. 11,189,118

Post Grant Review No. PGR2022-00059

DECLARATION OF PHILIP C. DUMAS

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	A. "offline door lock"	51
	B. "credential device"	52

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IX.	PR	IOR ART REFERENCES
	A.	Cahill (Ex.1005)
	B.	Kraus (Ex.1006)
	C.	Deros (Ex.1007)
	D.	Ho (Ex.1008)
	E.	Wired (Ex.1013)
Х.	AN	JALYSIS
	A.	Ground 1: Claims 1-20 Lack Of Written Description Of The Smart Hub Communicatively Coupled To A User Device Via A Non-LoRaWAN Communication Link
	B.	Ground 2: Claims 1-20 Are Obvious In Light Of Cahill And Deros84
		1. Motivation to Combine Cahill and Deros84
		a. LoRa WAN85
		b. Smart Thermostats And Other Smart Devices
		c. Smart Thermostat Hub88
		d. Smart Hub Communicatively Couple To User Device90
		2. Independent Claim 193
		a. [1pre] "A system for controlling and securing a plurality of smart devices within a unit of a multi-family residential or commercial property, the system comprising:"
		b. [1a] "a smart hub comprising: one or more processors; a memory communicatively coupled to the one or more processors"
		c. [1b] "a first communication interface configured to communicatively couple the one or more processors to a

		Long Range (LoRa) wide area network (LoRaWAN) communication link; and"96
	d.	[1c] "a second communication interface configured to communicatively couple the one or more processors to the plurality of smart devices and to a user device associated with an occupant of the unit via a non-LoRaWAN communication link;"
	e.	[1d] "where the one or more processors are configured to: receive control information via the LoRaWAN communication link from a property management platform for the multi-family residential or commercial property, the control information including a request for a status check associated with an electronic door lock,"
	f.	[1e] "identify at least one smart device of the plurality of smart devices based on the control information, the at least one smart device including the electronic door lock,104
	transi	mit a command derived from the control information to the at least one smart device via the non-LoRaWAN communication link"
	g.	[1f] "receive status information from the electronic door lock via the non-LoRaWAN communication link based on transmission of the command, and
	transı	mit the status information to the property management platform for the multi-family residential or commercial property via the LoRaWAN communication link."105
3.	Claim 2	
	a.	[2a] "The system of claim 1 where electronic door lock comprises an offline door lock and"107
	b.	[2b] "the command is further configured to disable at least one access credential stored at a memory of the offline door lock."

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4.	proce contr secon LoRa a then tempo	In 3 – "The system of claim 1 where: the one or more essors are configured to derive a second command from the ol information, the second command to be transmitted to a ad smart device of the at least one smart device via the non- WAN communication link, the second smart device comprises mostat and the second command is configured to adjust a erature setting of the thermostat, or the second smart device brises a smart light fixture and the second command is gured to turn off or turn on the smart light fixture."	
5.	proce comm	n 4 – "The system of claim 1 where the one or more essors, the first communication interface, the second nunication interface, and the memory are integrated within a ng of a thermostat."	
6.	electr	Claim 5 – "The system of claim 1 where the smart hub is coupled to electrical wiring at the multi-family residential or commercial property."	
7.	Claim 6 – "The system of claim 1 where the smart hub is located within the unit of the multi-family residential or commercial property."		
8.	Claim 7114		
	a.	[7a] "The system of claim 1 where: the non-LoRaWAN communication link comprises at least one of a Wireless Fidelity (Wi-Fi) communication link, a ZigBee communication link, and a Bluetooth communication link," 	
	b.	[7b] "the second communication interface is configured to directly couple the one or more processors to the plurality of smart devices via the non-LoRaWAN communication link, and"	
	c.	[7c] "communicatively coupling the one or more processors to the user device enables user interaction with the smart hub."	

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