Joint Claim Construction Statement -- Exhibit A
Case No.: SACV-14-00947-CJC (DFMx)

Term	Plaintiffs' Proposed Construction	Kwikset's Proposed Construction
"automatically cause[s] a message to be generated" ['778 Patent claim 16; '374 Patent claim 14]	**No construction necessary, but if construed:** **"cause[s] a message to be generated without user input"** ***Intrinsic Evidence*** "It is thus one aspect of the present invention to provide a system and method that automatically updates credentials on a mobile device immediately after authorization changes have been made." ['778 Patent at 3:17-20][1] "Specifically, the present invention utilizes communication techniques and protocols to automatically and remotely update credential information associated with one or a set of mobile devices." ['778 Patent at 4:60-63] "The communication network 116 provides a way for the controller 102 to automatically notify	**"cause a message to be created without receiving a message request from a user"** ***Intrinsic Evidence*** Claims 2, 9, 14, 26, 31 in '778 Patent. Claims 3, 13, 20, 29 in '374 Patent. Col. 3:17-20. Col. 3:50-59. Col. 7: 5-8. Col. 9:36-62. Col. 9:63- Col. 10:6. Col. 10:7-32. Col. 10:60-64. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 11. [AA0000161]. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 12. [AA0000162]. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 13. [AA0000163].

[1] The '374 Patent is a continuation of the '778 Patent and therefore shares the same specification. Each passage described herein as appearing at a particular location in the '778 Patent is also found in the '374 Patent, except typically 1 line lower. For example, the instant passage appears in the '778 Patent at 3:17-20 and in the '374 Patent at 3:18-21. Although not listed separately in this chart, it should be understood that all terms appearing in the '374 Patent and which are supported in this chart by passages from the '778 Patent are also supported by the identical passages in the '374 Patent specification.

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	and/or update information to the mobile devices 112 related to the access system 100. " ['778 Patent at 7:4-7] "Referring now to FIG. 3, a method of automatically and remotely updating credential information on a mobile device 112 will be described in accordance with embodiments of the present invention. The method begins at step 300 then proceeds to step 304 where credential information is changed at the controller 102. As noted above, credential information can include any data, set of data, encryption schemes, keys, transmission protocol, and the like, used by a particular mobile device 112 to verify its authenticity to a reader 108. Altering, modifying, enabling, disabling, revoking, adding, and updating any portion of the credential information may effect a change in the credential information. The credential information changed at the controller 102 is then updated at the database 130 in step 308. Thereafter, in step 312, information is retrieved from the database 130 by the controller 102 relating to what mobile device the changed information was associated with. The mobile device corresponding to the changed information is then identified as the target device. For example, if the access rights of one user have been modified, then the mobile device 112 associated with that user is the only mobile device 112 that	'778 Patent File History, Office Action Response dated January 28, 2009, pg. 3. [AA0000126]. '374 Patent File History, Response to Office Action dated Sept. 26, 2011, pg. 10. [AA0001137]. '374 Patent File History, Response to Office Action dated Sept. 26, 2011, pg. 11. [AA0001138]. ***Extrinsic Evidence*** '778 EPO Equivalent File History, Response to EPO Communication dated Feb. 23, 2015, pg. 3. '778 Canadian Equivalent File History, Response to Requisition for Appn. 2,647,713 dated May 8, 2013, pg. 3. '778 Canadian Equivalent File History, Response to Requisition for Appn. 2,647,713 dated May 8, 2013, pg. 4. Edward Tittel may provide testimony in support of Plaintiffs construction. Mr. Tittel will rely upon the asserted claims, specification, drawings and file history of the '778 Patent to support his testimony. In addition, Mr. Tittel may rely upon the *IEEE Standard Dictionary: Glossary of Terms and Definitions* (2009), *American Heritage®*

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	needs to have its respective memory 200 updated, and thus the single mobile device 112 is the targeted mobile device 112. Alternatively, a change may relate to a number of mobile devices 112 and each device will need to receive the updated information on its respective memory 200. Thus each mobile device 112 will become a targeted device. Once a targeted device is determined in step 312, a message is sent from the controller 102 to the determined (targeted) mobile device 112 via the communication network 116 in step 316. That information is received at the mobile device 112 through interface 136 by the antenna 226 that forwards this information to the RF modulation/demodulation unit 230 where the signal is demodulated. The RF modulation/demodulation unit 230 then sends the demodulated update signal to processor 204. The processor updates the memory 200 to reflect the change that was made at the controller 102 in step 320." ['778 Patent at 9:36-10:6] "Referring now to FIG. 4, another method of updating, enabling, and/or revoking the credentials of a mobile device 112 will be described in accordance with embodiments of the present	*Dictionary of the English Language* (Fifth Edition 2011), EPO and Canadian equivalent file histories for the '778 Patent, Chaum, David. *"Zero-knowledge undeniable signatures."* Advances in Cryptology—EUROCRYPT'90. Springer Berlin Heidelberg, 1991, U.S. Patent 6,170,744, U.S. Patent 6,229,806, U.S. Patent 5,781,629, and Schneier, Bruce, *Applied Cryptography: Protocols, Algorithms and Source Code*, C, J Wiley & Sons, 1996. **"automatic** Pertaining to a process or device that, under specified conditions, functions without intervention by a human operator. *IEEE Standard Dictionary: Glossary of Terms and Definitions* (2009). **"automatic** Acting or operating in a manner essentially independent of external influence or control." *American Heritage® Dictionary of the English Language* (Fifth Edition 2011). retrieved February 24 2015 at http://www.thefreedictionary.com/automatic. **"message** A grouping of data elements (DEs) and message attributes, used to convey information. Note: For the purposes of this standard, a message is an abstract description using a message set template, not a specific instance." *IEEE Standard Dictionary: Glossary of Terms and Definitions* (2009) *quoting* IEEE Std 1488-2000 and IEEE Std 1489-1999.

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	invention. The method starts at step 400 and proceeds to step 404 where a time interval between credential updates is determined. The time period may vary depending upon the requirements and security needs of the system 100. For example, the interval may be set to update credentials every second, minute, hour, day or a variation thereof." ['778 Patent at 10:7-15] ***Extrinsic Evidence*** Dr. Richard Mihran may testify that this term does not need construction. Dr. Mihran may also testify that if the term is construed, Plaintiff's proposed construction is consistent with what a person of ordinary skill in the art at the time of the invention would understand this term to mean.	
"automatically initiating a system update process" ['778 Patent claim 1; '374 Patent claim 1] "automatically initiate a system update process" ['778 Patent claim 16; '374 Patent claim 14]	**No construction necessary, but if construed:** **"initiate [initiating] a system update process without user input "** ***Intrinsic Evidence*** "It is thus one aspect of the present invention to provide a system and method that automatically updates credentials on a mobile device immediately after authorization changes have been made."	**"pushing credentials to a mobile device without a request from the user or the mobile device"** ***Intrinsic Evidence*** Claims 2, 9, 14, 26, 31 in '778 Patent. Claims 3, 13, 20, 29 in '374 Patent. Col. 3:17-20. Col. 3:50-59.

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	['778 Patent at 3:17-20] "Specifically, the present invention utilizes communication techniques and protocols to automatically and remotely update credential information associated with one or a set of mobile devices." ['778 Patent at 4:60-63] "The communication network 116 provides a way for the controller 102 to automatically notify and/or update information to the mobile devices 112 related to the access system 100. " ['778 Patent at 7:4-7] "Referring now to FIG. 3, a method of automatically and remotely updating credential information on a mobile device 112 will be described in accordance with embodiments of the present invention. The method begins at step 300 then proceeds to step 304 where credential information is changed at the controller 102. As noted above, credential information can include any data, set of data, encryption schemes, keys, transmission protocol, and the like, used by a particular mobile device 112 to verify its authenticity to a reader 108. Altering, modifying, enabling, disabling, revoking, adding, and	Col. 7:5-8. Col. 9:36-62. Col. 9:63- Col. 10:6. Col. 10:7-32. Col. 10:60-64. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 11. [AA0000161]. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 12. [AA0000162]. '778 Patent File History, Office Action Response dated July 1, 2009, pg. 13. [AA0000163]. '778 Patent File History, Office Action Response dated January 28, 2009, pg. 3. [AA0000126]. '374 Patent File History, Response to Office Action dated Sept. 26, 2011, pg. 10. [AA0001137]. '374 Patent File History, Response to Office Action dated Sept. 26, 2011, pg. 11. [AA0001138]. ***Extrinsic Evidence*** '778 EPO Equivalent File History, Response to EPO Communication dated Feb. 23, 2015, pg. 3.

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