

Attorney Docket: UKY-778IPR

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inter partes Review Case No. IPR2015-01440

Inter partes Review of: U.S. Patent No. 7,706,778

Issued: April 27, 2010

To: Peter R. Lowe

For: System and Method for Remotely Assigning and Revoking Access
Credentials Using a Near Field Communication Equipped Mobile Phone

**PETITION FOR *INTER PARTES* REVIEW OF
USPN 7,706,778**

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Table of Exhibits

Exhibit	Description	Publication Date or Filing Date	Type of Prior Art (35 U.S.C.)
1001	USPN 7,706,778 (“’778 patent”) (patent under <i>Inter Partes</i> Review)	April 3, 2006	N/A
1002	Declaration of Bruce Schneier in Support of Request for <i>Inter Partes</i> Review of the ’778 Patent	N/A	N/A
1003	Joint Claim Construction and Prehearing Statement Pursuant to Local Patent Rule 4-3, Ex. A, <i>Assa Abloy AB v. Spectrum Brands, Inc.</i> , Civil Action No. 14-cv-00947-CJC (C.D. CA)	N/A	N/A
1004	USPN 7,205,882 to Libin (“Libin”)	Nov. 10, 2004	102(e)
1005	USPN 7,012,503 by Nielsen (“Nielsen”)	Dec. 5, 2002	102(a)
1006	USPN 7,873,989 by Kärkäs et al. (“Kärkäs”)	Mar. 14, 2002	102(a)

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Through counsel, real party-in-interest UniKey Technologies, Inc. (“Petitioner” or “UniKey”) hereby petitions for *Inter Partes* Review (“IPR”) under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42 of claims 1-42 of U.S. Patent 7,706,778 (Ex. 1001) (“778 patent”). This Petition shows that there is a reasonable likelihood that Petitioner will prevail in establishing that at least one of these claims is unpatentable and should be canceled.

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)

A. Real Party-In-Interest under 37 C.F.R. § 42.8(b)(1)

Petitioner, UniKey Technologies, Inc., is the real party-in-interest for the instant petition.

B. Related Matters under 37 C.F.R. § 42.8(b)(2)

The following matters would affect, or may be affected, by a decision in this proceeding: *Assa Abloy AB v. Spectrum Brands, Inc.*, Civil Action No. 14-cv-00947-CJC, filed on June 19, 2014 in the U.S. District Court for the Central District of California (“District Court Action”); U.S. Patent No. 8150374; U.S. Application Nos. 13/404915, 14/674085, 14/674094, 14/674109, 14/674125, 14/674167, 14/674175; and IPR2015-01441.

C. Lead and Back-Up Counsel under 37 C.F.R. § 42.8(b)(3)

Petitioner provides the following designation of counsel.

LEAD COUNSEL	BACK-UP COUNSEL
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D. Service Information under 37 C.F.R. § 42.8(b)(4)

UniKey may be served at the lead counsel address provided in Section I.C of this Petition and consents to electronic service at the email address indicated.

E. Proof of Service on the Patent Owner

As identified in the attached Certificate of Service, a copy of the present Petition, in its entirety, including all exhibits and a power of attorney, is being served by EXPRESS MAIL[®] to Sheridan Ross PC, 1560 Broadway, Suite 1200, Denver, CO 80202.

F. Power of Attorney

A power of attorney pursuant to 37 C.F.R. § 42.10(b) is filed herewith.

II. PAYMENT OF FEES UNDER 37 C.F.R. § 42.103

The undersigned paid the fee set forth in 37C.F.R. § 42.15(a), as required by 37 C.F.R. § 42.103, from Deposit Account No. 50-3081. The undersigned further authorizes the Director to charge any additional fees that may be due in connection with this matter to Deposit Account 50-3081.

III. REQUIREMENTS FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.104

A. Grounds for Standing under 37 C.F.R. § 42.104(a)

Petitioner certifies that the '778 patent is eligible for *Inter Partes* Review and further certifies that Petitioner is not barred or otherwise estopped from

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