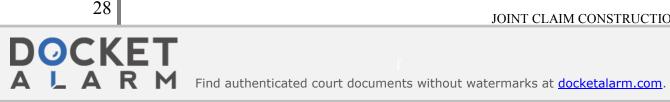
1 2 3 4 5 6 7	Michael T. Hornak (State Bar No. 81936 email: mhornak@rutan.com Ronald P. Oines (State Bar No. 145016) email: roines@rutan.com Bradley A. Chapin (State Bar No. 23288 email: bchapin@rutan.com Benjamin Deming (State Bar No. 233687 bdeming@rutan.com RUTAN & TUCKER, LLP 611 Anton Boulevard, Fourteenth Floor Costa Mesa, California 92626-1931 Telephone: 714-641-5100 Facsimile: 714-546-9035	5)	
8 9 10 11 12	Attorneys for Plaintiffs HID GLOBAL CORPORATION and ASSA ABLOY A William A. Delgado (Bar No. 222666) email: wdelgado@willenken.com WILLENKEN WILSON LOH & DELG 707 Wilshire Blvd., Suite 3850 Los Angeles, California 90017 Telephone: (213) 955-9240 Facsimile: (213) 955-9250		
13 14	Attorneys for Defendant, KWIKSET CORPORATION		
15	UNITED STATES DISTRICT COURT		
16	CENTRAL DISTRICT OF CALIFORNIA		
17			
18 19 20 21 22 23 24 25	HID GLOBAL CORPORATION, a Delaware corporation; and ASSA ABLOY AB, a Swedish Limited Liability Company, Plaintiffs, vs. KWIKSET CORPORATION, a Delaware corporation; and DOES 1 through 10, inclusive, Defendants.	Case No. SACV14-00947 CJC (DFMx) JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT PURSUANT TO PATENT LOCAL RULE 4-3	
26		SPECTRUM EX. 1006	
27		Spectrum Brands v. Assa Abloy US Patent No. 7,706,778	
28		JOINT CLAIM CONSTRUCTION AND	



Pursuant to Patent Local Rule 4-3 of the Northern District of California,		
which the parties have agreed to be bound by, Plaintiffs HID GLOBAL		
CORPORATION and ASSA ABLOY AB (collectively "Plaintiffs"), and Defendant		
KWIKSET CORPORATION ("Defendant") submit this Joint Claim Construction		
and Prehearing Statement for the construction of U.S. Patent Nos. 8,150,374 (the		
""374 Patent") and United States patent no. 7,706,778 (the ""778 Patent")		
(collectively, "Asserted Patents").		
A. CONSTRUCTION OF TERMS ON WHICH THE PARTIES AGREE		
(Patent Local Rule 4-3(a))		
The parties have not agreed on the construction of any claim terms.		
B. CONSTRUCTION OF DISPUTED TERMS (Patent Local Rule 4-3(b))		
The parties' respective positions as to the construction of disputed terms, as		
well as identification of intrinsic and extrinsic evidence are set forth in Exhibit A		
hereto.		
C. IDENTIFICATION OF THE TERMS WHOSE CONSTRUCTION THE		
PARTIES BELIEVE WILL BE MOST SIGNIFICANT TO THE		
RESOLUTION OF THIS CASE (Patent Local Rule 4-3(c))		
The parties have identified the following terms as the most significant to the		
resolution of this case.		
1. "automatically cause[s] a message to be generated"		
2. "automatically initiate [initiating] a system update process"		
3. "credential"		
4. "credential data"		
5. "mobile device"		
6. "self-authenticating data"		
7. "smart mobile device"		



JOINT CLAIM CONSTRUCTION AND

1	D. ANTICIPATED LENGTH	OF TIME NECESSARY FOR THE CLAIM
2	CONSTRUCTION HEARI	NG (Patent Local Rule 4-3(d)).
3	Plaintiff believes that the clai	m construction hearing should last no more than
4	two to three hours.	
5	Defendant believes that the cl	laim construction hearing should last no more
6	than three to four hours.	
7	E. WHETHER THE PARTIE	S WILL CALL ANY WITNESSES AT THE
8	CLAIM CONSTRUCTION	HEARING (Patent Local Rule 4-3(e)).
9	Plaintiff may call its expert w	ritness Rick Mihran. Dr. Mihran may testify as
10	to whether each term needs to be construed, and if construed, that Plaintiff's	
11	proposed construction is consistent with what a person of ordinary skill in the art at	
12	the time of the invention would understand this term to mean.	
13	Defendant anticipates calling its expert witness, Ed Tittel, to testify in a	
14	manner consistent with the construction positions identified in Exhibit A.	
15		
16	Dated: May 15, 2015	RUTAN & TUCKER, LLP MICHAEL T. HORNAK
17		RONALD P. OINES BRADLEY A. CHAPIN
18		RAVI MOHAN
19		By: /s/ Ronald P. Oines
20		Ronald P. Oines
21		Attorneys for Plaintiffs HID GLOBAL CORPORATION and ASSA ABLOY AB
22	Dated: May 15, 2015	WILLENKEN WILSON LOH &
23	Duted. 141dy 13, 2013	DELGADO LLP
24		By: /s/ William A. Delgado
25		
26		William A. Delgado Attorneys for Defendant KWIKSET CORPORATION
27		
28		IOINT OF AIM CONCEDITOR AND



SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual and Rule 5-4.3.4 (a)(2) of the United States District Court for the Central District of California Local Rules, I hereby certify that the content of this document is acceptable to William A. Delgado, counsel for Kwikset Corporation, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: May 15, 2015 RUTAN & TUCKER LLP

By: <u>/s/ Ronald Oines</u> Ronald Oines

Attorneys for Plaintiffs
HID GLOBAL CORPORATION and
ASSA ABLOY AB

JOINT CLAIM CONSTRUCTION AND

DOCKET A L A R M

CERTIFICATE OF SERVICE I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case. Dated: May 15, 2015 **RUTAN & TUCKER LLP** By: /s/ Benjamin Deming Benjamin Deming Attorneys for Plaintiffs HID GLOBAL CORPORATION and ASSA ABLOY AB

JOINT CLAIM CONSTRUCTION AND

DOCKET

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