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13 Attorneys for Defendant, KWIKSET CORPORATION

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 15 UNITED STATES DISTRICT COURT  
 16 CENTRAL DISTRICT OF CALIFORNIA

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 18 HID GLOBAL CORPORATION, a  
 Delaware corporation; and ASSA  
 19 ABLOY AB, a Swedish Limited  
 Liability Company,

20 Plaintiffs,

21 vs.

22 KWIKSET CORPORATION, a  
 23 Delaware corporation; and DOES 1  
 through 10, inclusive,

24 Defendants.  
 25

Case No. SACV14-00947 CJC (DFMx)

**JOINT CLAIM CONSTRUCTION  
 AND PREHEARING STATEMENT  
 PURSUANT TO PATENT LOCAL  
 RULE 4-3**

**SPECTRUM EX. 1006**  
 Spectrum Brands v. Assa Abloy  
 US Patent No. 7,706,778

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 JOINT CLAIM CONSTRUCTION AND

1 Pursuant to Patent Local Rule 4-3 of the Northern District of California,  
2 which the parties have agreed to be bound by, Plaintiffs HID GLOBAL  
3 CORPORATION and ASSA ABLOY AB (collectively “Plaintiffs”), and Defendant  
4 KWIKSET CORPORATION (“Defendant”) submit this Joint Claim Construction  
5 and Prehearing Statement for the construction of U.S. Patent Nos. 8,150,374 (the  
6 “374 Patent”) and United States patent no. 7,706,778 (the “778 Patent”)  
7 (collectively, “Asserted Patents”).

8 **A. CONSTRUCTION OF TERMS ON WHICH THE PARTIES AGREE**  
9 **(Patent Local Rule 4-3(a))**

10 The parties have not agreed on the construction of any claim terms.

11 **B. CONSTRUCTION OF DISPUTED TERMS (Patent Local Rule 4-3(b))**

12 The parties’ respective positions as to the construction of disputed terms, as  
13 well as identification of intrinsic and extrinsic evidence are set forth in **Exhibit A**  
14 hereto.

15 **C. IDENTIFICATION OF THE TERMS WHOSE CONSTRUCTION THE**  
16 **PARTIES BELIEVE WILL BE MOST SIGNIFICANT TO THE**  
17 **RESOLUTION OF THIS CASE (Patent Local Rule 4-3(c))**

18 The parties have identified the following terms as the most significant to the  
19 resolution of this case.

- 20 1. “automatically cause[s] a message to be generated”
- 21 2. “automatically initiate [initiating] a system update process”
- 22 3. “credential”
- 23 4. “credential data”
- 24 5. “mobile device”
- 25 6. “self-authenticating data”
- 26 7. “smart mobile device”

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JOINT CLAIM CONSTRUCTION AND

1 **D. ANTICIPATED LENGTH OF TIME NECESSARY FOR THE CLAIM**  
2 **CONSTRUCTION HEARING (Patent Local Rule 4-3(d)).**

3 Plaintiff believes that the claim construction hearing should last no more than  
4 two to three hours.

5 Defendant believes that the claim construction hearing should last no more  
6 than three to four hours.

7 **E. WHETHER THE PARTIES WILL CALL ANY WITNESSES AT THE**  
8 **CLAIM CONSTRUCTION HEARING (Patent Local Rule 4-3(e)).**

9 Plaintiff may call its expert witness 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  
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RONALD P. OINES  
BRADLEY A. CHAPIN  
RAVI MOHAN

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19 By: /s/ Ronald P. Oines  
20 Ronald P. Oines  
21 Attorneys for Plaintiffs HID GLOBAL  
CORPORATION and ASSA ABLOY AB

22  
23 Dated: May 15, 2015

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DELGADO LLP

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25 By: /s/ William A. Delgado  
26 William A. Delgado  
27 Attorneys for Defendant  
KWIKSET CORPORATION

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JOINT CLAIM CONSTRUCTION AND

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**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: /s/ Ronald Oines  
Ronald Oines  
Attorneys for Plaintiffs  
HID GLOBAL CORPORATION and  
ASSA ABLOY AB

JOINT CLAIM CONSTRUCTION AND

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**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

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