

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC,
Petitioner

v.

PROXENSE, LLC
Patent Owner

IPR2021-_____
Patent No. 8,352,730

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,352,730
UNDER 35 U.S.C § 312 AND 37 C.F.R. § 42.104**

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EXHIBIT LIST

No.	Exhibit
1001	U.S. Patent No. 8,352,730
1002	File History for U.S. Patent No. 8,352,730
1003	Declaration of Andrew Wolfe, Ph.D.
1004	Curriculum vitae of Andrew Wolfe, Ph.D.
1005	International App. No. WO 1999056429 to Scott et al.
1006	U.S. Patent Pub. No. 2004/0044627 A1 to Russell et al.
1007	U.S. Patent Pub. No. 2001/0000535 A1 to Lapsley et al.
1008	U.S. Patent Pub. No. 2003/0177102 A1 to Robinson
1009	U.S. Patent Pub. No. 2004/0153649 A1 to Rhoads et al.
1010	U.S. Patent No. 7,239,226 B2 to Berardi et al.
1011	U.S. Patent No. 6,175,921 B1 to Rosen
1012	U.S. Patent Pub. No. 2002/0109580 A1 to Shreve et al.
1013	U.S. Patent Pub. No. 2003/0055792 A1 to Kinoshita et al.
1014	“Applied Cryptography—Protocols, Algorithms, and Source Code in C” (1996) by Schneier
1015	Declaration of Sylvia Hall-Ellis, Ph.D.
1016	Proxense’s Infringement Contention Chart for U.S. 8,352,730

LIST OF CHALLENGED CLAIMS

Claim	U.S. Patent No. 8,352,730
1pre	A method for verifying a user during authentication of an integrated device, comprising the steps of:
1A	persistently storing biometric data of the user and a plurality of codes and other data values comprising a device ID code uniquely identifying the integrated device and a secret decryption value in a tamper proof format written to a storage element on the integrated device that is unable to be subsequently altered;
1B	wherein the biometric data is selected from a group consisting of a palm print, a retinal scan, an iris scan, a hand geometry, a facial recognition, a signature recognition and a voice recognition;
1C	responsive to receiving a request for a biometric verification of the user, receiving scan data from a biometric scan;
1D	comparing the scan data to the biometric data to determine whether the scan data matches the biometric data;
1E	responsive to a determination that the scan data matches the biometric data, wirelessly sending one or more codes from the plurality of codes and the other data values for authentication by an agent that is a third-party trusted authority possessing a list of device ID codes uniquely identifying legitimate integrated devices,
1F	wherein the one or more codes and other data values includes the device ID code; and
1G	responsive to authentication of the one or more codes and the other data values by the agent, receiving an access message from the agent allowing the user access to an application,
1H	wherein the application is selected from a group consisting of a casino machine, a keyless lock, a garage door opener, an ATM machine, a hard drive, computer software, a web site and a file.
2	The method of claim 1, wherein the one or more codes and the other data values are transmitted to the agent over a network.
3	The method of claim 1, further comprising: registering an age

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