UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT
OF TEXAS AUSTIN DIVISION

CARBYNE BIOMETRICS, LLC, Plaintiff, v. APPLE INC., Defendant.	Civil Action No. 1:23-cv-00324 JURY TRIAL DEMANDED

APPLE INC.'S FINAL ELECTION OF ASSERTED PRIOR ART

In accordance with the Court's Order Focusing Claims and Prior Art to Reduce Costs [ECF No. 111], Apple Inc. narrows its prior art to the following.

Prior art references for one or more of U.S. Patent Nos. 9,972,010; 10,713,656; and 11,526,886:

1. The combination of the FaceCash Peer-to-Peer System ("FaceCash Peer-to-Peer System") and the Federal Financial Institutions Examination Council ("FFIEC")
2. The combination of the PayPal ("PayPal System") and FFIEC
3. The combination of the PayPal System and the BioID System ("BioID System");
4. The combination of the PayPal System, the BioID System, and U.S. Patent Publication No. 2009/0152343 ("Bank of America Publication")
5. The combination of U.S. Patent Publication No. 2010/0042535 ("eBay Publication") and the Authenticam System
6. The combination of the eBay Publication, the Authenticam System, and the Bank of America Publication
7. The combination of the FaceCash Peer-to-Peer System, FFIEC, and U.S. Patent Publication No. 2009/0192937 ("PayPal Avatar Publication")
8. The combination of the PayPal System, FFIEC, and the PayPal Avatar Publication
9. The combination of the eBay Publication, the Authenticam System, and the PayPal Avatar Publication.

Prior art references for each of U.S. Patent Nos. 11,475,105 and 11,514,138:

10. The Eikon To Go System

11. The combination of the Eikon To Go System and DropBox

12. The combination of the Eikon To Go System and RSA SecurID

13. The ThinkPad System

Additional prior art references for U.S. Patent No. 11,514,138:

14. The combination of the Eikon To Go System and U.S. Patent Publication No. 2015/0339495 ("Blackberry 495")

15. The combination of the Eikon To Go System, RSA SecurID, and Blackberry 495

16. The Aegis Bio System

17. The combination of the Aegis Bio System and Blackberry 495

18. The combination of ThinkPad System and Blackberry 495

Additional prior art references for U.S. Patent No. 11,475,105:

19. The combination of the Eikon To Go System and European Patent Application Publication No. 2079023 A2 ("Hitachi 023")

20. The combination of the Eikon To Go System, RSA SecurID, and Hitachi 023

21. The combination of U.S. Patent Publication No. 2011/0138450 ("Kesanupalli"), and Hitachi 023

22. The combination of Kesanupalli, U.S. Patent Publication No. 2004/0117636 ("Cheng"), and Hitachi 023

23. The combination of U.S. Patent No. 10,360,351 ("Jakobsson 351") and Hitachi 023

24. The combination of the ThinkPad System and Hitachi 023

Dated: October 23, 2023

/s/ Andrew Radsch

Brian C. Nash
Regan J. Rundio
MORRISON & FOERSTER LLP
300 Colorado St., Suite 1800
Austin, TX 78701
Tel: (512) 617-0650
Fax: (737) 910-0730
Email: BNash@mofo.com
Email: Rrundio@mofo.com

James R. Batchelder (*pro hac vice*)
Andrew Radsch
James Mack
ROPES & GRAY LLP
1900 University Avenue
East Palo Alto, CA 94303-2284
Tel: 650-617-4000
Fax: 650-617-4090
James.Batchelder@ropesgray.com
Andrew.Radsch@ropesgray.com
James.Mack@ropesgay.com

Cassandra Roth (*pro hac vice*)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Phone: +1-212-596-9000
Fax: +1-212-596-9090
Cassandra.Roth@ropesgray.com

Allen S. Cross (*pro hac vice*)
Nicole Pobre (*pro hac vice*)
ROPES & GRAY LLP
2099 Pennsylvania Avenue, N.W.
Washington, DC 20006
Telephone: (202) 508-4600
Facsimile: (202) 508-4650
Allen.cross@ropesgray.com
Nicole.Pobre@ropesgray.com

S. Lara Ameri (*pro hac vice*)
Ropes & Gray LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199-3600
Phone: +1-617-951-7000
Fax: +1-617-951-7050
Lara.Ameri@ropesgray.com
Attorneys for Defendant, Apple Inc.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record are being served with a copy of the foregoing document via electronic service on October 23, 2024.

/s/ Drago Gregov
Drago Gregov