

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner,

v.

PROXENSE, LLC
Patent Owner

IPR2024-00405
U.S. Patent No. 10,073,960 B1

IPR2024-00407
U.S. Patent No. 9,679,289 B1

INTRODUCTION

- Claimed General-Purpose Computers with Functions Require Structure
- The Claims Recite a General-Purpose Computer and Function
- Local Secured Information is Defined in the Specification

An Algorithm is Required for a Claimed General Purpose Computer

“Because general purpose computers can be programmed to perform very different tasks in very different ways, simply disclosing a computer as the structure designated to perform a particular function does not limit the scope of the claim to "the corresponding structure, material, or acts" that perform the function, as required by section 112 paragraph 6.”

Aristocrat Techs. Austl. Pty Ltd. v. Int'l Game Tech., 521 F.3d 1328, 1333(Fed. Cir. 2008).

The Claims Recite a General-Purpose Computer and Functions

wherein one or more of (a) the integrated RDC communicating wirelessly with the at least one external device within the proximity zone and (b) the local, secured information stored by the integrated, secure memory enables one or more of an application, a function, and a service.

289 Patent, Claim 1

wherein one or more of (a) the integrated, wireless communication interface communicating wirelessly with the at least one external device within the proximity zone enables one or more of an application, a function, and a service and (b) the local, secured information stored by the integrated, secure memory enables one or more of an application, a function, and a service.

960 Patent, Claim 1

Integrated Secure Memory stores Local, Secure Information

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289 Patent, Claim 1

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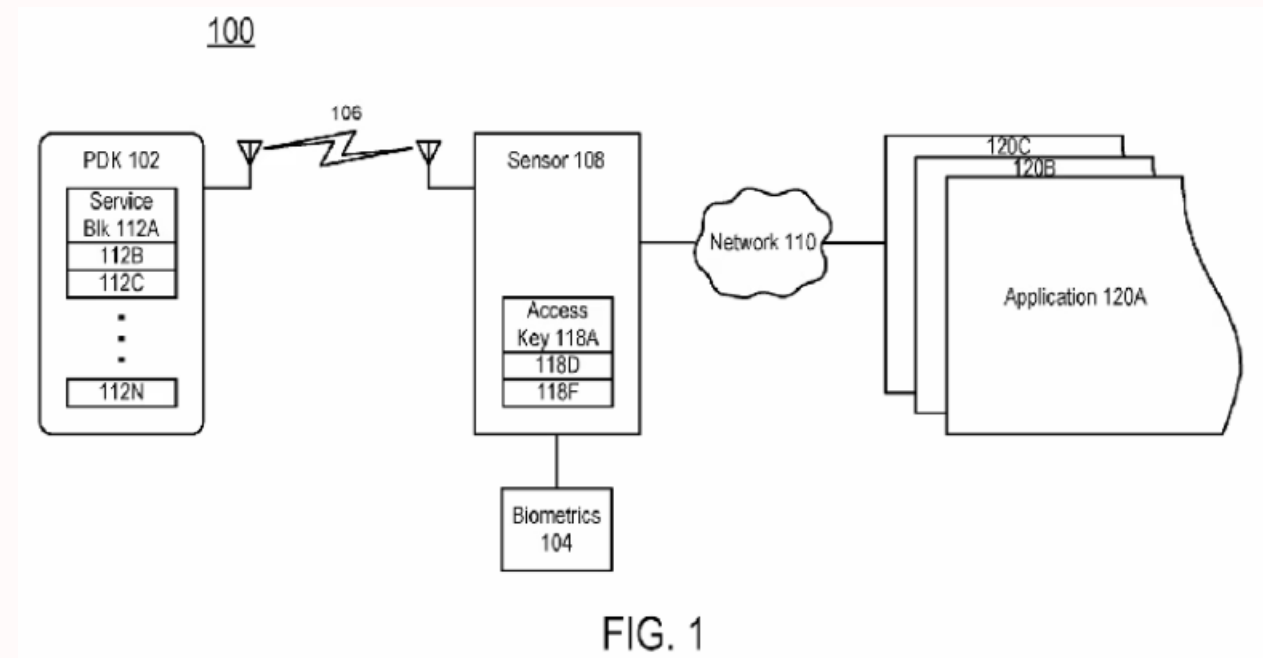
960 Patent, Claim 1

See Rain Computing, Inc. v. Samsung Electronics America Co., 989 F.3d 1002 (Fed. Cir. 2021)

Local Secured Information Is Defined in the Specification

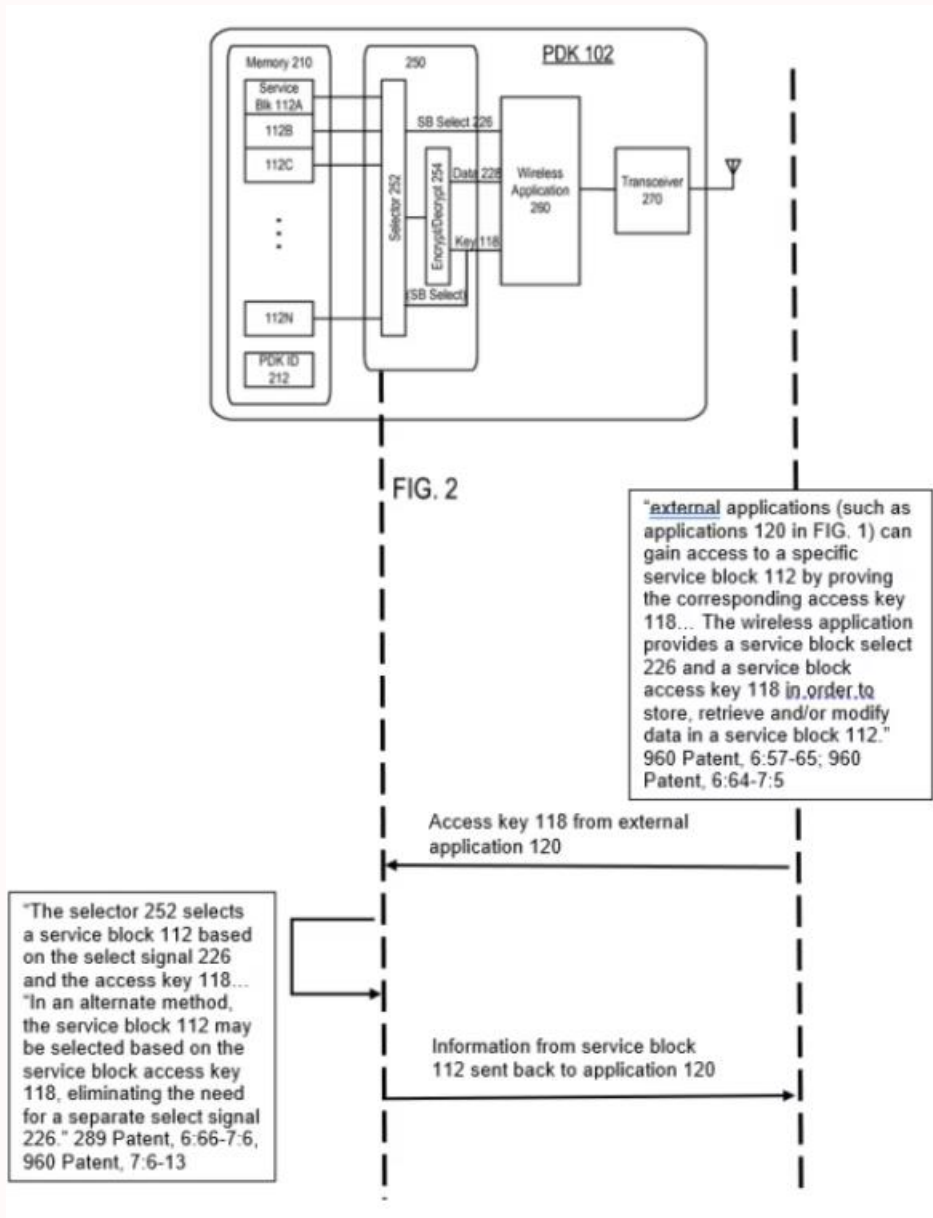
The PDK 102 includes multiple service blocks 112A-N as described in more detail in FIG. 2. Each service block 112 is accessed using a corresponding service block access key 118. In this example, the sensor 108 contains three of the service block access keys 118A, D, F. The service block access keys 118 allow the sensor 108 to unlock information stored in the corresponding service blocks 112, which information is used as local secured information.

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289 Patent, 3:43-50.

The Algorithm is disclosed in the Specification

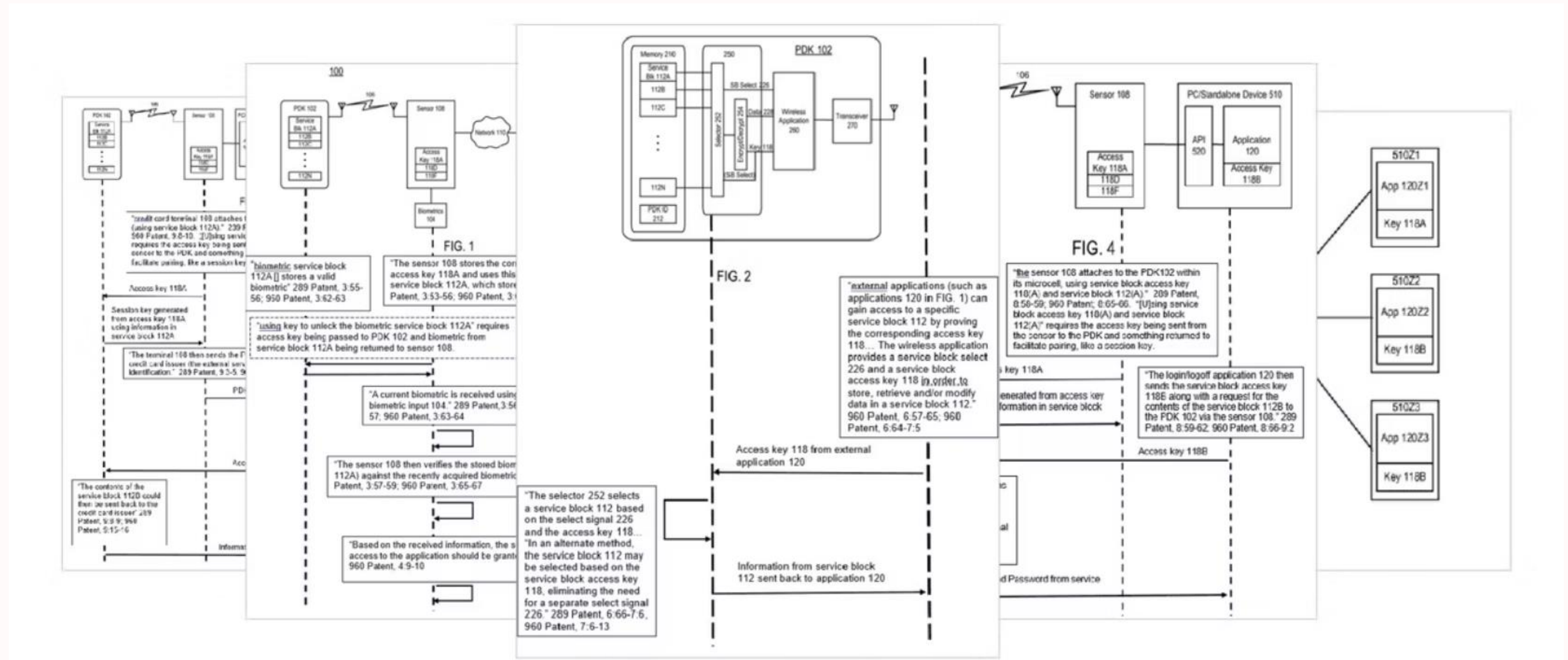


Regardless of how created, once created, external applications (such as applications 120 in FIG. 1) can gain access to a specific service block 112 by proving the corresponding access key 118. In FIG. 2, this is shown conceptually by control logic 250. The wireless application 260 on the PDK 102 communicates to the sensor (not shown in FIG. 2) via transceiver 270. The wireless application provides a service block select 226 and a service block access key 118 in order to store, retrieve and/or modify data in a service block 112. The selector 252 selects a service block 112 based on the select signal 226 and the access key 118. The encryption

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engine 254 encrypts/decrypts data 228 flowing to/from the service block 112 based on the access key 118 (or some other key generated based on the access key, for example a session key). In an alternate method, the service block 112 may be selected based on the service block access key 118, eliminating the need for a separate select signal 226.

289 Patent, 6:57 – 7:6

The Algorithm is Repeated in Multiple Examples



289 Patent, 6:57 – 7:6) and Illustrated in Numerous Examples