

**EXHIBIT A****I. U.S. Patent No. 9,687,920**

<b>Term #</b>	<b>Claim Term</b>	<b>Claim(s)</b>	<b>Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>	<b>Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>
1	"key positioner configured to engage said master key"	1, 10, 19	<p>35 U.S.C. § 112(6) does not apply; plain and ordinary meaning; in the alternative, "positioning device capable of engaging the master key"</p> <p><u>Intrinsic Evidence</u> '920 Patent: claims 1–4, 6, 10, 15–17, 19–22, and 24.</p> <p>'920 Patent: Figures 5, 6, and 9–11; col. 4, lines 9–14; col. 7, line 55 to col. 8, line 3; col. 10, line 41 to col. 12, line 45; col. 14, line 62 to col. 15, line 16; col. 15, lines 24–30; and col. 15, line 36 to col. 16, line 3.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00174, pp. 3, 4, 11, 12, 18, 19, 23–29, 36, 42–48, 51, 52, 55–72, 74, 83, and 84.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00174 (Exhibit 1023), pp. 3, 23, 24, 31, 32, 36–42, 49–51, 56–65, 69–74, 79–86, 88, 98, and 99.</p>	<p><b>Function:</b> engage and position said master key <b>Structure:</b> finger engaging the side of the master key</p> <p>Alternatively, if 35 U.S.C. § 112(6) does not apply, "positioner finger engaging the side of the master key"</p> <p><u>Intrinsic Evidence</u> '920 patent, Figs. 1, 9-11, Col. 3:36-41, 6:24-55, 7:55-8:14, 9:1-20, 10:2-66, 11:2-13:51, 14:30-16:3, 17:4-20, Claims 1-25</p> <p>'920 patent, FH, 9/12/2016 Claims, 11/18/2016 Non-Final Rejection, 12/23/2016 Remarks, 4/18/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u> Declaration of Robert Almblad</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<u>Extrinsic Evidence</u> WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY, 2002 (HY-KO00020696-20707), p. 1769 ("positioner": "one that positions; <i>esp</i> : a mechanical device for placing or holding a body in position during an operation (as welding or drilling)")	Phillips, Bill, Locksmithing, Second Edition, 2010, McGraw Hill, pages 365-397. (HILLMAN-000017754)  Phillips, Bill, Master Locksmithing, 2008, McGraw Hill, pages 359-400. (HILLMAN-000017708)  Hy-Ko's 11/22/2021 Interrogatory Responses, Ex. B, pages 2-3.
2	"tip view"	10	Plain and ordinary meaning; in the alternative, "view of a tip"  <u>Intrinsic Evidence</u> '920 Patent: claim 10.  '920 Patent: Figures 6, 22, 25; col. 2, line 53 to col. 3, line 3; col. 4, lines 9-14; col. 7, line 55 to col. 8, line 14; col. 9, lines 40-51.  PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00174, pp. 3-4  DECLARATION OF GEORGE L. HEREDIA, IPR2022-00174 (Exhibit 1023), pp. 3, 32	view of the key into the tip towards the head  <u>Intrinsic Evidence</u> '920, Figs. 1, 4a, 4b, 5, 10, 22, Col. 9:40-51, 11:59-12:10, Claims 10-17  '920 patent, FH, 9/12/2016 Claims, 11/18/2016 Non-Final Rejection, 12/23/2016 Remarks, 4/18/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks  U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]  U.S. Patent No. 4,899,391, Abstract, Figs. 1-15, Col. 1:46-4:30, 4:59-5:20, 5:21-6:10, Claim 1  U.S. Patent No. 8,644,619, Fig. 2a, 2b, 3, 4, 6, Col. 4:11-7:43, Col. 1-23

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
				<p>U.S. Patent No. 5,807,042, Fig. 8, at Col. 3:13-22, 4:57-65</p> <p>U.S. Patent No. 5,908,273, Fig. 8, Col. 8:1-9:10</p> <p>U.S. Patent No. 6,185,311, Col. 1:6-2:23, Figs. 1A, 1B, 2A, 2B</p> <p>U.S. Patent No. 6,543,972, Col. 4:1-41</p> <p>U.S. Patent Publication No. 2002/0191849, Figs 1-8, 11, [0017]-[0032], [0035]-[0066]</p> <p><u>Extrinsic Evidence</u>  Declaration of Robert Almblad</p> <p>Phillips, Bill, Locksmithing, Second Edition, 2010, McGraw Hill, page 394. (HILLMAN-000017754)</p> <p>Phillips, Bill, Master Locksmithing, 2008, McGraw Hill, page 397. (HILLMAN-000017708)</p> <p>Rathjen, Joseph E., Locksmithing From Apprentice to Master, TAB Books, 1995, pages 173-175. (HILLMAN-000017791)</p> <p>U.S. Patent No. 9,514,385 (HILLMAN-000017683); Col. 4:7-7:45, Fig. 2a, 2b, 3, 4, 6, 14, Col. claims 1-26</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
				<p>File History of U.S. Patent No. 9,514,385, including the 7/27/2016 NOA, 6/17/2016 Applicant Remarks and Claims, 12/17/2015 Final Rejection, 10/22/2015 Remarks and Claims. (HILLMAN-000016520)</p> <p>HY-KO00004915</p> <p>HY-KO00004622</p>
3	“substantively tip view”	10	<p>Not indefinite; plain and ordinary meaning; in the alternative, “view including a tip”</p> <p><u>Intrinsic Evidence</u>  ‘920 Patent: claim 10.</p> <p>‘920 Patent: Figures 6, 22, 25; col. 2, line 53 to col. 3, line 3; col. 4, lines 9–14; col. 7, line 55 to col. 8, line 14; col. 9, lines 40–51.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00174, pp. 3–4</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00174 (Exhibit 1023), pp. 3, 32</p>	<p>Indefinite</p> <p><u>Intrinsic Evidence</u>  Any intrinsic evidence cited for “tip view”</p> <p><u>Extrinsic Evidence</u>  Declaration of Robert Almblad</p> <p>Any extrinsic evidence cited for “tip view.”</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<u>Extrinsic Evidence</u> WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY, 2002 (HY-KO00020696-20707), p. 2280 ("substantially": "in a substantial manner: so as to be substantial")	
4	"measure a thickness"	18	Not indefinite; plain and ordinary meaning  <u>Intrinsic Evidence</u> '920 Patent: claim 18  '920 Patent: col. 4, lines 9-14; col. 4, lines 15-34; col. 9, lines 40-51  PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00174, pp. 3, 4, 33-35, 70, 76, 77, 79-81, and 83.  DECLARATION OF GEORGE L. HEREDIA, IPR2022-00174 (Exhibit 1023), pp. 3, 32, 46-48, 84, 85, 88, and 90-97.  <u>Extrinsic Evidence</u> WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY, 2002 (HY-KO00020696-20707), p. 1400 ("measure": "3a: to lay off, mark, or fix (a	Indefinite  Alternatively, "measure the distance from the lowest to the highest point of the key."  <u>Intrinsic Evidence</u> '920, Figs. 1-26, Col. 4:15-34, 7:5-8:3, 9:40-51, 9:65-10:25, Claims 18-24  '920 patent, FH, 9/12/2016 Claims, 11/18/2016 Non-Final Rejection, 12/23/2016 Remarks, 4/18/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks  U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]  U.S. Patent No. 7,890,878, Col. 1:18-2:50, 8:62-9:52, 11:55-12:54  <u>Extrinsic Evidence</u> Declaration of Robert Almblad

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>specified distance or extent) by making measurements... b: to lay off, mark, or fix the exact dimensions or plan of by making measurements... 4a: to ascertain the quantity, mass, extent, or degree of in terms of a standard unit or fixed amount usu. by means of an instrument or container marked off in the units.”)</p> <p>MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY, TENTH EDITION, 1995 (HY-KO00020685–20695), p. 720 (“measure”: “4: to ascertain the measurements of”)</p>	<p>Phillips, Bill, Locksmithing, Second Edition, 2010, McGraw Hill, pages 365-397. (HILLMAN-000017754)</p> <p>Phillips, Bill, Master Locksmithing, 2008, McGraw Hill, pages 359-400. (HILLMAN-000017708)</p> <p>Rathjen, Joseph E., Locksmithing From Apprentice to Master, TAB Books, 1995, pages 173-175. (HILLMAN-000017791)</p>
5	“the housing”	18	<p>Not indefinite; plain and ordinary meaning; in the alternative, “a housing”</p> <p><u>Intrinsic Evidence</u></p> <p>’920 Patent: claims 1–3, 6, 14–16, 18, 20, 21, 24, and 27.</p> <p>’920 Patent: Figures 1–3, 5–8, 20, 21; col. 4, lines 9–14; col. 6, lines 1–12</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00174, pp. 3–4, 11, 22–24, 30, 32, 55–57, 63, 69, and 83.</p>	<p>Indefinite</p> <p><u>Intrinsic Evidence</u></p> <p>’920, Figs. 1-10, Col. 1:31-4:65, 6:1-12, Claims 1-6, 14-16, 18-27</p> <p>’920, FH, 9/12/2016 Claims, 11/18/2016 Non-Final Rejection, 12/23/2016 Remarks, 4/18/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks</p> <p>U.S. Patent No. 7,214,011, Figs. 1-7, Col. 1:44-63, 5:10-6:33, Claims 1-13</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			DECLARATION OF GEORGE L. HEREDIA, IPR2022-00174 (Exhibit 1023), pp. 3, 10, 23, 32, 35–37, 43, 46, 69–71, 77, 83, and 97.	U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]  ‘133, claims 1-24  ‘432, claims 1-27  <u>Extrinsic Evidence</u> Declaration of Robert Almblad

**II. U.S. Patent No. 9,656,332**

<b>Term #</b>	<b>Claim Term</b>	<b>Claim(s)</b>	<b>Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>	<b>Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>
6	"positioning said master key to a desired location to align the master key with an optical imaging device"	11	<p>Plain and ordinary meaning</p> <p><u>Intrinsic Evidence</u> '332 Patent: claim 11</p> <p>'332 Patent: Figures 5 and 6; col. 4, lines 9–14; col. 6, lines 24–47; col. 7, line 55 to col. 8, line 3.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00168, pp. 3, 4, 15–17, 30, 34–36, 38, and 39.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00168 (Exhibit 1017), pp. 2, 25, 26–31, 38, 39, 42–44, 47, and 48.</p>	<p>This step must occur after the “receiving” step.</p> <p><u>Intrinsic Evidence</u> '332 patent, Figs. 1-12, 14-15, 21, Col. 3:7-4:1, 6:1-8:43, 9:1-64, 10:2-66, 11:2-13:51, 14:30-16:3, 17:4-20, Claims 1-17</p> <p>'332 patent, FH, 9/12/2016 Claims, 1/17/2017 Non-Final Rejection, 3/8/3017 Claims, 3/8/2017 Remarks, 4/12/2017 NOA, 6/19/2017 Request for CoC, 7/25/2017 CoC</p> <p>'920 patent, Claims 1-27</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u> Declaration of Robert Almblad</p>
7	"selectively capturing a second image"	11	<p>Plain and ordinary meaning; in the alternative, “capturing a second image in a selected manner”</p> <p><u>Intrinsic Evidence</u> '332 Patent: claims 1, 2, 11, 12</p>	<p>This step must occur after the “determining” step.</p> <p><u>Intrinsic Evidence</u> '332 patent, Figs. 1-12, 14-15, 21, Col. 3:7-4:1, 6:1-8:43, 9:1-64, 10:2-66, 11:2-13:51, 14:30-16:3, 17:4-20, Claims 1-17</p>



Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>'332 Patent: Figures 5–7; col. 4, lines 9–14; col. 6, lines 24–32; col. 7, line 55 to col. 8, line 60; col. 9, lines 40–64.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00168, pp. 3, 4, 18–22, and 26–32.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00168 (Exhibit 1017), pp. 2, 11, 25, 33, and 35–40.</p> <p><u>Extrinsic Evidence</u></p> <p>WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY, 2002 (HY-KO00020696–20707), p. 2058 (“selectively”: “in a selective manner: by selection”)</p> <p>MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY, TENTH EDITION, 1995 (HY-KO00020685–20695), p. 1095 (“selective”: “1: of, relating to, or characterized by selection”)</p>	<p>'332 patent, FH, 9/12/2016 Claims, 1/17/2017 Non-Final Rejection, 3/8/3017 Claims, 3/8/2017 Remarks, 4/12/2017 NOA, 6/19/2017 Request for CoC, 7/25/2017 CoC</p> <p>'920 patent, Claims 1-27</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>

**III. U.S. Patent No. 10,421,133**

<b>Term #</b>	<b>Claim Term</b>	<b>Claim(s)</b>	<b>Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>	<b>Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence</b>
8	"retention mechanism panel"	1, 24	<p>Plain and ordinary meaning; in the alternative, "panel with a retention mechanism"</p> <p><u>Intrinsic Evidence</u></p> <p>'133 Patent: claims 1, 8, 22, and 24.</p> <p>'133 Patent: Figures 1–3, 5, 6, 12; col. 4, lines 9–14; col. 6, lines 48–55; col. 7, line 55 to col. 8, line 3; col. 10, lines 26–40; col. 12, lines 30–45; col. 13, line 64 to col. 14, line 16.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00169, pp. 3, 4, 20–23, 29, 34, 48</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00169 (Exhibit 1017), pp. 2, 27, 28, 34–37, 46–48, and 65.</p>	<p>slidable panel with a retention mechanism located on it</p> <p><u>Intrinsic Evidence</u></p> <p>'133 patent, Figs. 1-26, Col. 1:23-4:4, 6:1-9:51, 10:26-16:3, Claims 1-24</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p> <p>Phillips, Bill, Locksmithing, Second Edition, 2010, McGraw Hill, pages 365-397. (HILLMAN-000017754)</p> <p>Phillips, Bill, Master Locksmithing, 2008, McGraw Hill, pages 359-400. (HILLMAN-</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
				000017708)
9	"An integrated key duplication machine"	1	<p>This language appears in the preamble and is not a limitation, therefore no construction is required; in the alternative, plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u>  '133 Patent: claims 1–10</p> <p>'133 Patent: Figures 1–3, 5–12, 14, 15, 20, and 21; col. 4, lines 9–14.</p> <p>'133 Prosecution History: March 2, 2017 Response to Office Action; November 16, 2017 Response to Final Office Action; June 18, 2018 Response to Final [sic, Non-Final] Office Action; April 18, 2019 Response to Final Office Action.</p>	<p>The preamble is limiting</p> <p><u>Intrinsic Evidence</u>  '133 patent, Figs. 1-26, Col. 1:23-4:4, 4:35-57, 5:23-43, 6:1-9:51, 10:26-16:3, Claims 1-24, Title</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u>  Declaration of Robert Almblad</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
				Any extrinsic evidence cited for the term "key blank identification system configured to operate individually from the key cutting system" below.
10	"A plurality of key duplication systems"	11	<p>This language appears in the preamble and is not a limitation, therefore no construction is required; in the alternative, plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p>'133 Patent: claims 11–23</p> <p>'133 Patent: Figures 1–3, 5–12, 14, 15, 20, and 21; col. 4, lines 9–14.</p> <p>'133 Prosecution History: March 2, 2017 Response to Office Action; November 16, 2017 Response to Final Office Action; June 18, 2018 Response to Final [sic, Non-Final] Office Action; April 18, 2019 Response to Final Office Action.</p>	<p>The preamble is limiting</p> <p><u>Intrinsic Evidence</u></p> <p>'133 patent, Figs. 1-26, Col. 1:23-4:4, 4:35-57, 5:23-43, 6:1-9:51, 10:26-16:3, Claims 1-24, Title</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
				Any extrinsic evidence cited for the term "key blank identification system configured to operate individually from the key cutting system" below.
11	"key blank identification system configured to operate individually from the key cutting system"	1, 11, 24	<p>Not indefinite, plain and ordinary meaning; in the alternative, "key blank identification system capable of operating independently from the key cutting system"</p> <p><u>Intrinsic Evidence</u></p> <p>'133 Patent: claims 1, 11, and 24.</p> <p>'133 Patent: Figures 1–3, 5–12, 14, 15, 20, and 21; col. 4, lines 9–14; col. 5, lines 23–43.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00169, pp. 3, 4, 23–25, 30, 34, 35, 48, and 49.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00169 (Exhibit 1017), pp. 2, 27, 28, 37, 38, 44, 48, 49, and 65–67.</p> <p><u>Extrinsic Evidence</u></p> <p>WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY,</p>	<p>Indefinite</p> <p><u>Intrinsic Evidence</u></p> <p>'133 patent, Figs. 1-26, Col. 1:23-4:4, 5:23-43, 6:1-9:51, 10:26-16:3, Claims 1-24</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Patent No. 7,890,878, Fig. 1, Col. 3:49-4:3, 11:55-13:2</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>2002 (HY-KO00020696–20707), p. 1152 (“individually”: “in an individual manner... c: one by one, singly, separately”); p. 1148 (“independently”: “in an independent manner: without dependence on another”)</p> <p>MERRIAM-WEBSTER’S COLLEGIATE DICTIONARY, TENTH EDITION, 1995 (HY-KO00020685–20695), p. 593 (“individual”: “3: existing as a distinct entity: separate”); p. 591 (“independent”: “1: not dependent: as a(1): not subject to control by others ... (2) not affiliated with a larger controlling unit b(1): not requiring or relying on something else”)</p>	<p><u>Extrinsic Evidence</u> Declaration of Robert Almblad</p> <p>TechTerms.com (definition of “integrated”), Nov. 21, 2014, available at <a href="https://techterms.com/definition/integrated">https://techterms.com/definition/integrated</a>. (HILLMAN-000017706)</p>

## IV. U.S. Patent No. 9,682,432

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
12	"for communicating with a transponder on the key"	1, 13	<p>Plain and ordinary meaning; in the alternative, "for receiving data from and/or transmitting data to a transponder on the key"</p> <p><u>Intrinsic Evidence</u></p> <p>'432 Patent: claims 1, 4, 5, 8, 9, 13, 14, 20, 21.</p> <p>'432 Patent: Figures 27–29; col. 4, lines 37–42; col. 6, lines 29–41; col. 17, lines 49 to col. 18, line 40.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00175, pp. 2, 4, 5, 21–26, 30, 35, 37, 43, 47, 50, 54, 60, and 63.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00175 (Exhibit 1020), pp. 15, 38, 41–46, 50, 55, 57, 63, 66, 67, 70, 75, 82, and 86.</p> <p><u>Extrinsic Evidence</u></p> <p>MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY, TENTH EDITION, 1995 (HY-KO00020685–20695), p. 232</p>	<p>for communicating with a transponder on the key in the key load position</p> <p><u>Intrinsic Evidence</u></p> <p>'432 patent, Abstract, Figs. 1-29, Col. 1:24-4:32, 4:37-62, 5:27-9:3, 9:29-16:31, 17:3-19:3, Claims 1-27</p> <p>'432 patent, FH, 9/12/2016 Claims, 11/3/2016 Non-Final Rejection, 12/23/2016 Claims, 12/23/2016 Remarks, 4/19/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks, 5/5/2017 NOA, 6/18/2021 Request for CoC, 7/6/2021 CoC</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>("communicate": "2a: to convey knowledge of or information about... 3: to send information or messages sometimes back and forth")</p> <p>McGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS, SIXTH EDITION, 2003 (HY-KO00020681–20684), p. 440</p> <p>("communication": "The transmission of intelligence between two or more points over wires or by radio")</p>	<p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>
13	"for communicating with a transponder on the master key [or key blank]"	8, 20	<p>Plain and ordinary meaning; in the alternative, "for receiving data from and/or transmitting data to a transponder on the master key"</p> <p><u>Intrinsic Evidence</u></p> <p>'432 Patent: claims 1, 4, 5, 8, 9, 13, 14, 20, 21.</p> <p>'432 Patent: Figures 27–29; col. 4, lines 37–42; col. 6, lines 29–41; col. 17, lines 49 to col. 18, line 40.</p> <p>PETITION FOR <i>INTER PARTES</i> REVIEW, NO. IPR2022-00175, pp. 2,</p>	<p>for communicating with a transponder on the master key [or key blank] in the key load position [retention mechanism]</p> <p><u>Intrinsic Evidence</u></p> <p>'432 patent, Abstract, Figs. 1-29, Col. 1:24-4:32, 4:37-62, 5:27-9:3, 9:29-16:31, 17:3-19:3, Claims 1-27</p> <p>'432 patent, FH, 9/12/2016 Claims, 11/3/2016 Non-Final Rejection, 12/23/2016 Claims, 12/23/2016 Remarks, 4/19/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks, 5/5/2017 NOA, 6/18/2021 Request for CoC, 7/6/2021 CoC</p>



Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>4, 5, 21–26, 30, 35, 37, 43, 47, 50, 54, 60, and 63.</p> <p>DECLARATION OF GEORGE L. HEREDIA, IPR2022-00175 (Exhibit 1020), pp. 15, 38, 41–46, 50, 55, 57, 63, 66, 67, 70, 75, 82, and 86.</p> <p><u>Extrinsic Evidence</u></p> <p>MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY, TENTH EDITION, 1995 (HY-KO00020685–20695), p. 232 (“communicate”: “2a: to convey knowledge of or information about... 3: to send information or messages sometimes back and forth”)</p> <p>McGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS, SIXTH EDITION, 2003 (HY-KO00020681–20684), p. 440 (“communication”: “The transmission of intelligence between two or more points over wires or by radio”)</p>	<p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>
14	“A method for identifying [and duplicating] a key”	1, 8, 13	This language appears in the preamble and is not a limitation, therefore no construction is required; in the	The preamble is limiting

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
			<p>alternative, plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p>'432 Patent: claims 1–19</p> <p>'432 Prosecution History: December 23, 2016 Response to Office Action; April 20, 2017 Response to Final Office Action.</p>	<p><u>Intrinsic Evidence</u></p> <p>'432 patent, Abstract, Figs. 1-29, Col. 1:24-4:32, 4:37-62, 5:27-9:3, 9:29-16:31, 17:3-19:3, Claims 1-27, Title</p> <p>'432 patent, FH, 9/12/2016 Claims, 11/3/2016 Non-Final Rejection, 12/23/2016 Claims, 12/23/2016 Remarks, 4/19/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks, 5/5/2017 NOA, 6/18/2021 Request for CoC, 7/6/2021 CoC</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>

Term #	Claim Term	Claim(s)	Plaintiff Hy-Ko's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence	Defendant Hillman's Preliminary Construction and Supporting Intrinsic and Extrinsic Evidence
15	"An identification system for duplicating keys"	20	<p>This language appears in the preamble and is not a limitation, therefore no construction is required; in the alternative, plain and ordinary meaning.</p> <p><u>Intrinsic Evidence</u></p> <p>'432 Patent: claims 20–27</p> <p>'432 Prosecution History: December 23, 2016 Response to Office Action; April 20, 2017 Response to Final Office Action.</p>	<p>The preamble is limiting</p> <p><u>Intrinsic Evidence</u></p> <p>'432 patent, Abstract, Figs. 1-29, Col. 1:24-4:32, 4:37-62, 5:27-9:3, 9:29-16:31, 17:3-19:3, Claims 1-27, Title</p> <p>'432 patent, FH, 9/12/2016 Claims, 11/3/2016 Non-Final Rejection, 12/23/2016 Claims, 12/23/2016 Remarks, 4/19/2017 Final Rejection, 4/20/2017 Claims, 4/20/2017 Remarks, 5/5/2017 NOA, 6/18/2021 Request for CoC, 7/6/2021 CoC</p> <p>'133 patent, FH, 9/12/2016 Claims, 12/2/2016 Non-Final Rejection, 3/2/2017 Claims, 3/2/2017 Remarks, 6/16/2017 Final Rejection, 11/16/2017 Claims, 11/16/2017 Remarks, 12/18/2017 Non-Final Rejection, 6/18/2018 Claims, 6/18/2018 Remarks, 10/18/2018 Final Rejection, 4/18/2019 Claims, 4/18/2019 Remarks, 6/26/2019 Notice of Allowance</p> <p>U.S. Provisional Application No., 60/761,293, Figs. 1-4, [0001]-[0026]</p> <p><u>Extrinsic Evidence</u></p> <p>Declaration of Robert Almblad</p>