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**CONFIDENTIAL—SUBJECT TO FRE 408  
FOR SETTLEMENT PURPOSES ONLY**

December 16, 2022

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**VIA EMAIL (Confirmation by FedEx)**

***Re: Liberty Access Technologies Licensing LLC Patent Portfolio***

Dear Mr. McDonough:

We write to follow up on our December 1, 2022 letter concerning potential licensing of the Liberty Access Technologies LLC's (Liberty) patent portfolio and to raise issues regarding additional prior art known to ASSA ABLOY and its affiliates (AAAB).

Specifically, in addition to the confidential prior art discussed in our December 1, 2022 letter, we have now also identified AAAB patents that invalidate the patents in the Liberty Access Control Portfolio (see Attachment A).

For example, U.S. Patent Nos. 9,373,205 is exemplary of Liberty's Access Control Portfolio, which all share a common specification and inventors and are generally directed to "systems and methods . . . to allow a smartphone or any terminal to activate a door lock." '205 patent, Abstract. The common specification describes making a reservation using an "[i]nternet enabled cellular phone" and sending a "digital token or certificate" to a phone that communicates and shares the certificate with the "lock device." See, e.g., '205 patent, 5:55-67, 6:1-5. These core limitations—using a "reservation certificate" comprising ordinary information about the reservation to activate a door lock—appear throughout the the claims of Liberty's Access Control Portfolio, along with obvious variations.

An AAAB patent—U.S. Patent No. 8,730,004 (*Elfstrom*)—discloses these core limitations. For example, *Elfstrom* is directed to "[me]thods, systems, and devices for controlling access within a multi-room facility . . . by remotely confirm[ing] reservations to the facility." See *Elfstrom*, Abstract. *Elfstrom* achieves these methods using an "access control module with the ability to make a determination to either permit or deny user access to an asset controlled by the access control module," where "[t]he access

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control logic [within the access control module] provides the access control module with the ability to read access data from [access] credentials and make a determination as to whether or not the holder of the [access] credential is allowed to access any assets controlled by the access control module.” *Id.*, 6:55-66. *Elfstrom*’s access control module makes this determination when “the access credential compris[ing] . . . a mobile phone, PDA, . . . or the like” communicates with [the] access control module. *Id.*, 10:18-22. *Elfstrom*’s “communication module may facilitate communications between the [access] credential and access control module . . . [and] refers to the access data to ensure that the appropriate communication protocol is used by [access] credential in communicating with the access control module.” *Id.*, 9:59-64. The access data also includes “stay duration (identifying either a departure or an expiration date for the access data)” *Id.*, 12:35-36. And “based on the received access data . . . the access control module will make a determination as to whether or not the holder of the [access] credential is permitted to access any assets controlled by the access control module.” *Id.*, 12:10-14.

Additionally, the chart below identifies disclosures from *Elfstrom* that anticipate independent claim 1 of the exemplary ’205 patent. *Elfstrom* also teaches or renders obvious the additional limitations in the dependent claims.

<b>Exemplary ’205 Patent, Claim 1</b>	<b><i>Elfstrom</i></b>
An access device for use in an access control system, the access device comprising	See e.g., <i>Elfstrom</i> at 5:37-49, 6:6-9
a processor having control of a door lock and a communication module connected to the processor	See e.g., <i>Elfstrom</i> at 6:9-49
the processor is configured to receive a reservation certificate presented by a portable terminal through a communication module	See e.g., <i>Elfstrom</i> at 10:16-26
when a current reservation that comprises an interval of a reservation is presented by the portable terminal	See e.g., <i>Elfstrom</i> at 6:60-67, 7:1-3, 100. 9:41-58.
the processor is configured to compare the interval of the reservation of the current reservation certificate to a current time accessible to the processor	See e.g., <i>Elfstrom</i> at 1:26-31, 3:51-62, 7:43-56, 11:64-12:3
determine the current time is within the interval of the reservation	See e.g., <i>Elfstrom</i> at 12:22-26
activate the door lock to allow the portable terminal to unlock the door lock during the interval of the reservation	See e.g., <i>Elfstrom</i> at 12:29-36

In addition to *Elfstrom*, AAAB is aware of other patents and art—including additional patents in AAAB’s portfolio—that anticipate or render obvious the claims of the ’205 patent and Liberty’s Access Control Portfolio. At this time, this art is only known to AAAB, and AAAB looks forward to a response to its proposal to enter into licensing

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discussions with Liberty before AAAB files post-grant proceedings with AAAB's art, challenging the claims of or pursuing declaratory judgment actions related to Liberty's Access Control Portfolio.

We appreciate your attention to this matter, and we look forward to a response.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lionel M. Lavenue". The signature is written in a cursive style with a large initial 'L'.

Lionel M. Lavenue

Enclosures: Attachment A: Listing of Known Patents in Liberty's Access Control Portfolio