

EXHIBIT A

**EXHIBIT A
PLAINTIFF’S PROPOSED CLAIM CONSTRUCTIONS**

I. DISPUTED TERMS

	Claim term	Claim Nos.	RFCyber Proposed Construction	RFcyber Add’l. Extrinsic Evidence	RFCC
1	secured channel	218 ¹ : All claims '009: All claims	Plain and ordinary meaning		218 Patent 3A-C, 1: 4:35-56, '009 Pate 2A-F, 3A 9:30-10: 15:39-17 22:57-23
2	security channel	218: All claims '787: All claims '009: All claims '855: All claims	Plain and ordinary meaning		218 Patent 3A-C, 1: 4:35-56, '009 Pate 2A-F, 3A 9:30-10: 15:39-17 22:57-23

¹ As the ‘218, ‘855, and ‘787 Patent share a common specification, Plaintiff cites to the shared specification of a reference to the ‘218 Patent.

	Claim term	Claim Nos.	RFCyber Proposed Construction	RFcyber Add'l. Extrinsic Evidence	RFCC
3	[creating] “a security channel on top of the initial security channel”	218: 1, 11 '855: 1, 9 '787: 6-7, 16-17	Plain and ordinary meaning	Plaintiff may rely on the expert declaration or testimony of Dr. Mark T. Jones in support of its proposed claim constructions, or to rebut and respond to Defendant's proposed constructions.	218 Pater 3A-C, 1:(4:35-56,
4	Applet	218: All claims '855: All claims '787: All claims	Plain and ordinary meaning		218 Pater 4A-C, 4:(
5	contactless interface that facilitates communication between the e-purse applet in the smart card and the payment server over a wired network ²	All claims	Plain and ordinary meaning		218 Pater 41, 4:57-'009 Pate 2A-F, 3A 6A-B, 7, 14:32-59 40. '046 Pate 3A-B, 4A 7, 12:47-

² Google has indicated that it “reserves the right” to pursue indefiniteness arguments regarding this term at a later not agree that such reservation is proper under the rules, and reserves all rights to contest any such arguments.

	Claim term	Claim Nos.	RF Cyber Proposed Construction	RF Cyber Add'l. Extrinsic Evidence	RFC
6	e-purse / electronic purse	218: All claims '855: All claims '787: All claims '009: 3-5 '046: All claims	Plain and ordinary meaning		218 Patent 3A-C, 4A 3:46-4:40 6:10, 7:10 '218 File 21 Respo Action. '009 Patent at C, 4A-C, 10:3-40, 20:6, 21: '046 Patent 3A-B, 4A 7, 2:22-3 16:29, 20
7	install / installed	218: All claims '855: All claims '787: 2, 6-7, 12, 16 '009: All claims	Plain and ordinary meaning		218 Patent 3A-C, 4A 5:4, 5:60 '009 Patent 2A-F, 3A 6A-B, 7, 3:32-4:18 11:41-13 18:23-62

	Claim term	Claim Nos.	RFCyber Proposed Construction	RFcyber Add'l. Extrinsic Evidence	RFCC
8	payment server	218: All claims '855: 7-8 '787: All claims	plain and ordinary meaning		218 Patent 3A-C, 4A 4:22, 4:3 7:45-55.
9	personalize / personalized / personalizing / personalization	218: All claims '855: All claims '787: All claims '009: 6-12, 17	plain and ordinary meaning		218 Patent 3A-C, 1:6 4:35-56, '009 Patent 2A-F, 3A 9:30-10:4 15:39-17 22:57-23
10	pre-loaded with [an/the] emulator	218: All claims '855: 2, 5, 6, 11	plain and ordinary meaning		218 Patent 3A-C, 4A 5:4, 5:60
11	smart card	218: All claims	plain and ordinary meaning		218 Patent 3A-C, 4A 41, 4:8-5
12	e-purse SAM originally used to issue the e-purse / existing security authentication module (SAM) originally used to issue the e-purse ³	218: 3, 14	Plain and ordinary meaning		218 Patent 3A-C, 1:6 4:35-56,

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