UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics America, Inc. and
Samsung Electronics Co., Ltd.
Petitioners,

v.

RFCyber Corp.,
Patent Owner.

Patent No. 9,189,787 to Koh et al.

IPR Case No.: IPR2021-00980

DECLARATION OF GERALD W. SMITH

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CLAIM LISTING

Claim 1:

[Claim 1-PREAMBLE] A portable device for commerce, the portable device comprising:

[1a] an emulator loaded in a smart card module for storing security values and updated transaction logs, and

[1b] an e-purse applet to cause the portable device to function as an electronic purse (e-purse),

[1c] wherein both of the emulator and e-purse applet are already personalized via a personalization process built on a first security channel so that the emulator is set to store a set of keys for subsequent data access authentication and the e-purse applet is configured to conduct a transaction with a network server over a second security channel;

[1d] a first interface configured to perform field communication (NFC) with a reader to perform electronic commerce with the e-purse applet against a fund stored in the emulator;

[1e] a second interface configured to perform mobile commerce with a payment server via an application against the fund stored in the emulator; and

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[1f] a purse manager midlet being executed in the portable device to act as an agent to facilitate communications between the e-purse applet and a payment server to conduct transactions therebetween.

Claim 2:

The portable device as recited in claim 1, further comprising a security module configured to install and personalize the e-purse applet via either the first interface or the second interface, wherein the keys are updated when the personalization process built on the first security channel completes.

Claim 3:

The portable device as recited in claim 1, wherein the e-purse is built on top of a global platform to be able to access MIFARE data structures with an appropriate transformed password based on the keys in the emulator, wherein the global platform is a cross-industry membership organization created to advance standards for smart card growth.

Claim 4:

The portable device as recited in claim 1, wherein the first interface is based on a RFID interface that allows the portable device to act as a tag to be read off by the reader connected to a computing device coupled to the Internet.

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