## 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.

\_\_\_\_

U.S. Patent No. 9,189,787 to Koh et al. IPR Case No. IPR2021-00980

\_\_\_\_\_

## REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE



## **PETITIONERS' EXHIBIT LIST**

Exhibit No.	Description
1001	U.S. Patent No. 9,189,787 ("'787 patent")
1002	File History of U.S. Patent No. 8,118,218 ("'218 FH")
1003	Declaration of Gerald Smith Regarding Invalidity of U.S. Patent No. 8,118,218
1004	U.S. Patent Application Publication No. 2006/0165060 ("Dua")
1005	Defendants' Contingent Election Regarding Invalidity Defenses, RFCyber Corp v. Google LLC et al., Case Nos. 2:20-cv-00274-JRG and 2:20-cv-00335-JRG, DKT. 60, dated June 8, 2021
1006	GlobalPlatform Card Specification Version 2.1.1 (March 2003) ("GlobalPlatform" or "GP")
1007	File History of U.S. Patent No. 8,448,855 ("'855 FH")
1008	Smart Card Handbook Third Edition, by Wolfgang Rankl and Wolfgang Effing (2003)
1009	Common Electronic Purse Specifications, Technical Specification Version 2.3 (March 2001)
1010	SmartMX, P5CD009 Secure Dual Interface PKI Smart Card Controller, Short Form Specification (Rev. 1.0 – 2004 March 26)
1011	SmartMX, P5CD036 Secure Dual Interface PKI Smart Card Controller, Short Form Specification (Rev. 1.0 – 2004 March 26)
1012	SmartMX, P5CT072 Secure Dual Interface PKI Smart Card Controller, Short Form Specification (Rev. 1.3 – 4 October 2004)
1013	Mifare proX, P8RF6016 Secure Dual Interface Smart Card IC, Short Form Specification (Revision 1.0 – November 2003)



Exhibit No.	Description
1014	ETSI TS 102 226 V6.12.0 (2005-09), "Smart cards; Remote APDU structure for UICC based applications (Release 6)"
1015	Wenninger et al., "The Electronic Purse," in Current Issues in Economics and Finance, Volume 1, Number 1, Federal Reserve Bank of New York (April 1995).
1016	File History of U.S. Patent Application No. 13/782,948
1017	Excerpt from Cambridge Business English Dictionary
1018	U.S. Patent No. 6,983,882
1019	RFID Handbook – Radio-Frequency Identification Fundamentals and Applications, Klaus Finkenzeller, John Wiley & Son, Ltd. (1999)
1020	Mifare Standard Card IC MF1 IC S50 Functional Specification; Product Specification Revision 5.0, Philips Semiconductors (November 1999)
1021	ISO/IEC 7816-4:1995 Interindustry commands for interchange (May 1995)
1022	U.S. Government General Services Administration (GSA) Smart Card Handbook (FEB 2004)
1023	"Here Comes The Wallet Phone," IEEE Spectrum, November 2005
1024	File History of U.S. Patent No. 9,189,787 ("'787 FH")
1025	PCT Application Publication No. WO 98/49658 A1 to Visa International Service Association ("Davis")
1026	RFC 3261, SIP: Session Initiation Protocol, The Internet Society (June 2002).
1027	Hargrave's Communications Dictionary, IEEE Press, p. 24 (defining "applet") (excerpted)



Exhibit No.	Description
1028	U.S. Patent Application Publication No. 2004/0177045
1029	European Patent No. 1,369,842
1030	PCT Publication No. WO02/241236
1031	U.S. Patent No. 6,792,536
1032	U.S. Patent Application Publication No. 2006/0005050
1033	U.S. Patent No. 7,748,636
1034	File history of U.S. Patent No. 7,747,636
1035	NXP Semiconductors 2006 Annual Report
1036	SEC Report: Amendment No 1 to Form F-1 Registration Statement, filed by NXP Semiconductors, March 22, 2011
1037	U.S. Patent Application Publication No. 2006/0208066
1038	U.S. Patent No. 8,498,898 to Kogen et al. ("Kogen")
1039	U.S. Patent Application Publication No. 2006/0196931
1040	RESERVED
1041	RESERVED
1042	RESERVED
1043	RESERVED
1044	Plaintiff RFCyber's Election of Asserted Claims to Defendants Google LLC, Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc., Case Nos. 2:20-cv-00274-JRG and 2:20-cv-00335-JRG, dated September 15, 2021
1045	Plaintiff RFCyber's Final Election of Asserted Claims to Defendants Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc., Case Nos. 2:20-cv-00274-JRG and



Exhibit No.	Description
	2:20-cv-00335-JRG, dated October 11, 2021
1046	Defendant Samsung Electronics Co. Ltd.'s, and Samsung Electronics America, Inc.'s Motion to Strike the Priority Date Set Forth in Plaintiff's Interrogatory Responses, Case Nos. 2:20-cv-00274-JRG and 2:20-cv-00335-JRG, dated October 6, 2021



# DOCKET A L A R M

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

## **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

