

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS AMERICA, INC. and  
SAMSUNG ELECTRONICS CO., LTD.  
Petitioners,

v.

RFCYBER CORP.,  
Patent Owner.

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U.S. Patent No. 9,240,009 to Koh et al.  
IPR Case No. IPR2021-00981

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**REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE**

## PETITIONERS' EXHIBIT LIST

<b>Exhibit No.</b>	<b>Description</b>
1001	U.S. Patent No. U.S. 9,240,009 (the “’009 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, <i>RF Cyber Corp. v. Samsung Electronics Co., Ltd. et al.</i> , 2:20-cv-00335 (E.D. Tex.) (Dkt. 60) (filed 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)

<b>Exhibit No.</b>	<b>Description</b>
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	RESERVED
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	RESERVED
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	RESERVED
1026	RFC 3261, <i>SIP: Session Initiation Protocol</i> , The Internet Society (June 2002).
1027	RESERVED
1028	RESERVED
1029	RESERVED

<b>Exhibit No.</b>	<b>Description</b>
1030	RESERVED
1031	RESERVED
1032	RESERVED
1033	RESERVED
1034	RESERVED
1035	RESERVED
1036	RESERVED
1037	RESERVED
1038	RESERVED
1039	U.S. Patent Application Publication No. 2006/0196931
1040	Declaration of Sylvia Hall-Ellis, Ph.D.
1041	U.S. Patent Application Publication No. 2006/0174352 (“Thibadeau”)
1042	File history of U.S. Patent No. 9,240,009 (“’009 FH”)
1043	U.S. Patent No. 9,189,787
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 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

<b>Exhibit No.</b>	<b>Description</b>
	Set Forth in Plaintiff's Interrogatory Responses, Case Nos. 2:20-cv-00274-JRG and 2:20-cv-00335-JRG, dated October 6, 2021

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