

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. 9,240,009 to Koh et al.

IPR Case No. IPR2021-00981

**PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 1-17 OF U.S. PATENT NO. 9,240,009**

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CLAIM LISTING

CLAIM 1:

[1.PREAMBLE] A mobile device for conducting a secured transaction over a network, the mobile device comprising:

[1a] a network interface;

[1b] an interface to receive a secure element;

[1c] a memory space for storing at least a module and an application downloaded from the network;

[1d] a processor coupled to the memory space and configured to execute the module to perform operations including:

[1di] sending to a server via the network interface an identifier identifying the application together with device information of a secure element, [1dii] wherein the application is downloaded from the network in the mobile device;

[1diii] establishing a secured channel between the secure element and the server using a key set installed on the secure element, [1div] wherein the server is configured to prepare data necessary for the application to function as designed on the mobile device; and

[1dv] receiving the data from the server to associate the application with the secure element, [1dvi] wherein the application subsequently

functions in conjunction with the secure element.

CLAIM 2:

The mobile device as recited in claim 1, wherein the data received in the mobile device includes an application key set for the application, and a user interface specifically designed for the mobile device.

CLAIM 3:

The mobile device as recited in claim 2, wherein the mobile device is a near field communication (NFC) enabled mobile phone, and the application is an electronic purse (e-purse), the mobile device is used to exchange secured data with another device within a near distance to conduct a transaction.

CLAIM 4:

The mobile device as recited in claim 3, wherein the secured data is being exchanged over a secured channel between the mobile device and the another device established by the application key set.

CLAIM 5:

The mobile device as recited in claim 4, wherein the transaction is conducted without the mobile device communicating with a transaction server.

CLAIM 6:

[6.PREAMBLE] The mobile device as recited in claim 1, [6a] wherein said sending to a server via the network interface an identifier identifying the

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