

**UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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

v.

RF Cyber Corp.,  
Patent Owner.

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

IPR Case No.: IPR2021-00980

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**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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