

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

RFCYBER CORP.,

Patent Owner.

Patent No. 9,189,787

Filing Date: May 28, 2013

Issue Date: November 17, 2015

Inventors: Liang Seng Koh, Futong Cho, Hsin Pan, and Fuliang Cho

Title: METHOD AND APPARATUS FOR CONDUCTING
E-COMMENCE AND M-COMMENCE

PATENT OWNER'S RESPONSE

Case No. IPR2022-00412

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that the emulator is set to store a set of keys for subsequent
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to conduct a transaction with a network server over a second
security channel”/“personalizing the emulator and the e-purse
applet 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” as required by all Challenged
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1. Apple’s Combination Does Not Disclose Or Render
Obvious “an initial security channel between the smart
card module and a security authentication module
(SAM) external to the smart card module to install and
personalize the e-purse applet, and ... a security channel
on top of the initial security channel to protect

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