## UNITED STATES PATENT AND TRADEMARK OFFICE

## **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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

v.

RFCyber Corp., Patent Owner.

Patent No. 9,240,009 to Koh et al.

IPR Case No.: IPR2021-00981

# **DECLARATION OF GERALD W. SMITH**

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Declaration of Gerald W. Smith IPR2021-00981 U.S. Patent No. 9,240,009

# **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 Declaration of Gerald W. Smith IPR2021-00981 U.S. Patent No. 9,240,009

> [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.

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