UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

FINTIV, INC.,
Patent Owner

IPR2022-00976
U.S. Patent No. 9,892,386

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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E. "At least one of executing financial transactions, auditing financial transactions, invoking third-party services, handling errors, and logging platform objects" should be given its plain and ordinary meaning. 19

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A. The Petition demonstrated how the Grounds render obvious the challenged claims. 20

1. Dill discloses a subscriber depositing funds into the subscriber's account (limitation [1.10.3]) 20

2. Dill discloses a system that receives a "communication message from the mobile device" that "indicat[es] that the subscriber desires to deposit a specified amount of funds into the subscriber's account" (limitation [1.10.3]) 22

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3. The combination of Dill and Liao render obvious a system that withdraws funds from "an account associated with the subscriber" (limitation [2.12.1])....23

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PETITIONER'S EXHIBIT LIST

APPL-1001	U.S. Patent No. 9,892,386
APPL-1002	File History of U.S. Patent No. 9,892,386
APPL-1003	Declaration of Henry Houh, Ph.D.
APPL-1004	*Curriculum Vitae* of Henry Houh, Ph.D.
APPL-1005	U.S. Patent Publication No. 2009/0265272 to Dill et al. ("Dill")
APPL-1006	U.S. Patent Publication No. 2010/013334 to Vadhri ("Vadhri")
APPL-1007	U.S. Patent Publication No. 2009/0217047 to Akashika et al. ("Akashika")
APPL-1008	U.S. Patent Publication No. 2004/0230527 to Hansen et al. ("Hansen")
APPL-1009	U.S. Patent No. 7,865,141 to Liao et al. ("Liao")
APPL-1010	Claims Appendix for U.S. Patent No. 9,892,386
APPL-1011	Comparison chart for claims 1-3 of U.S. Patent No. 9,892,386
APPL-1012	G. Winfield Treese et al., "Designing Systems for Internet Commerce," Second Edition, Addison-Wesley, 2003 ("Treese") (excerpt)
APPL-1013	Original Complaint for Patent Infringement, *Fintiv, Inc. v. PayPal Holdings, Inc.*, No. 6:22-cv-00288, ECF. No. 1 (W.D. Tex. March 17, 2022) (Albright)
APPL-1014	H. Newton, "Newton's Telecom Dictionary," 17th Edition, CMP Books, 2001 (excerpt)
APPL-1015	T. Thai et al., ".Net Framework Essentials," Third Edition, O'Reilly & Associates, Inc., 2003 (excerpt)
APPL-1016	United States District Court – National Judicial Caseload Profile (June 2022), available at: https://www.uscourts.gov/statistics/table/na/federal-court-management-statistics/2022/06/30-2

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APPL-1017 **(NEW)**	Supplemental Declaration of Henry Houh, Ph.D.
APPL-1018 **(NEW)**	Deposition of Michael Shamos, Ph.D. (May 9, 2023)
APPL-1019 **(NEW)**	U.S. Patent No. 9,147, 184

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