

UNITED STATES PATENT AND TRADEMARK C

BEFORE THE PATENT TRIAL AND APPEAL B

APPLE INC.,

Petitioner,

v.

FINTIV, INC.,

Patent Owner.

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

PATENT OWNER'S DEMONSTRATIVE
EXHIBITS FOR ORAL ARGUMENT

Overview

- Business process services limitations (Claim 1-2)
- Deposit/Withdrawal Limitations (Claim 1-2)

Business Process Services Limitations

Claim 1- Deposit Funds Transaction

1. A monetary transaction system for conducting monetary transactions between subscribers and other entities, the system comprising one or more of:

an integration tier operable to manage mobile wallet sessions, the integration tier also including a communication application programming interface (API) and other communication mechanisms to accept messages from channels;

notification services operable to send notifications through different notification channels including one or more of short message peer-to-peer, short-message services and simple mail transfer protocol emails;

business process services operable to implement business workflows, including at least one of executing financial transactions, auditing financial transactions, invoking third-party services, handling errors, and logging platform objects;

....

APPL-1001, 30:1-31:3

Claim 2- Withdraw Funds Transaction

2. A monetary transaction system for conducting monetary transactions between subscribers and other entities, the system comprising one or more of:

an integration tier operable to manage mobile wallet sessions and maintain the integrity of financial transactions, the integration tier also including a communication application programming interface (API) and other communication mechanisms to accept messages from channels;

notification services operable to send notifications through different notification channels including one or more of short message peer-to-peer, short-message services and simple mail transfer protocol emails;

business process services operable to implement business workflows, including at least one of executing financial transactions, auditing financial transactions, invoking third-party services, handling errors, and logging platform objects;

...

APPL-1001, 32:3-32:20

DILL FAILS TO TEACH THE CLAIM PROCESS SERVICES (CLAIMS 1-3)

- Petitioner does not dispute that, under *SuperCom Enters*, 358 F.3d 870, 885-886 (Fed. Cir. 2004), one of A and B” requires at least one A and at least one B.
- Accordingly, the claims require that the business method be operable to implement, *inter alia*, (i) auditing at least one financial transaction, (ii) handling at least one error, and logging at least one platform object.
- Dill does not teach systems that’s performs and
 - auditing at least one financial transaction
 - handling at least one error
 - logging at least one platform object

Dill Does Not Teach “Auditing a Financial Transaction”

Claim Phrase
<p>“auditing financial transactions”</p> <p>(Claims 1-3)</p>

Dill discloses that “a transaction identifier can be assigned or chosen for a transfer transaction,” and “[t]his identifier can be used to identif[y] the sender 105, the recipient 110, or both and can be used by the transfer options module 145 to determine delivery of the transfer.” APPL-1005, ¶105. Dill teaches that “the money transfer facilitator...receive[s] and verif[ies] the transaction identifier[, and] **the application of the money transfer facilitator can send a recipient identifier to the mobile wallet application.** The recipient identifier can indicate an intended recipient of the money transfer transaction.” APPL-1005, ¶41. Thus, Dill teaches that the money transfer facilitator 140 (“business services”) is operable to implement business workflows, including...auditing financial transactions (e.g., by means of a unique identifier), as recited in [1.3]. APPL-1003, ¶97.

[0105] As noted above, a transaction identifier can be assigned or chosen for a transfer transaction. For example, a unique identifier for the receiver can be one or any combination of a mobile phone number, an email address, an instant messaging identification, a customer number, account information (e.g., stored value account identifier, bank account number and/or ABA routing number), tax number, Social Security Number or Taxpayer Identification Number, drivers’ license number, state ID number, student ID number or other unique identifier. A customer number can be a preferred customer number or any other unique customer identifier issued by a money transfer facilitator, an agent of a money transfer facilitator, a mobile network operator, a retailer, a bank, a service provider (e.g., payment service provider, information service provider or Internet service provider) or any other party. This identifier can be used to identify the sender, the recipient 110, or both and can be used by the transfer options module 145 to determine delivery of the transfer. The user can use the transfer options module 145 to select a delivery rule 151, if any.

Dill uses the “tra

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