

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.  
Petitioner

v.

RF Cyber Corp.  
Patent Owner

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Case No. IPR2022-01239  
U.S. Patent No. 10,600,046

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 10,600,046**

**TABLE OF CONTENTS**

<b>I.</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>II.</b>	<b>THE '046 PATENT .....</b>	<b>1</b>
A.	THE '046 PATENT'S ALLEGED INVENTION.....	1
B.	THE '046 PATENT'S PRIORITY DATE .....	3
C.	THE '046 PATENT'S PROSECUTION .....	6
D.	A PERSON OF ORDINARY SKILL IN THE ART .....	6
<b>III.</b>	<b>REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104 .....</b>	<b>7</b>
A.	STANDING UNDER 37 C.F.R. § 42.104(A) .....	7
B.	CHALLENGE UNDER 37 C.F.R. § 42.104(B) AND RELIEF REQUESTED .....	7
C.	CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.104(B)(3).....	8
<b>IV.</b>	<b>THE CHALLENGED CLAIMS ARE UNPATENTABLE .....</b>	<b>10</b>
A.	GROUND 1: CLAIMS 1, 2, 3, 4, 5, 12, 13, AND 14 ARE OBVIOUS OVER <i>LARACEY</i> IN VIEW OF <i>JOGU</i> .....	10
B.	GROUND 2: CLAIM 17 IS OBVIOUS OVER <i>LARACEY</i> IN VIEW OF <i>JOGU</i> AND IN FURTHER VIEW OF <i>TANG</i> .....	54
C.	GROUND 3: CLAIM 18 IS OBVIOUS OVER <i>LARACEY</i> IN VIEW OF <i>JOGU</i> AND IN FURTHER VIEW OF <i>DORSEY</i> .....	58
<b>V.</b>	<b>DISCRETIONARY CONSIDERATIONS.....</b>	<b>65</b>
A.	THE <i>GENERAL PLASTIC</i> FACTORS FAVOR INSTITUTION.....	65
B.	THE <i>FINTIV</i> FACTORS FAVOR INSTITUTION .....	66
<b>VI.</b>	<b>CONCLUSION .....</b>	<b>68</b>
<b>VII.</b>	<b>MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1).....</b>	<b>69</b>
A.	REAL PARTY-IN-INTEREST .....	69
B.	RELATED MATTERS .....	69
C.	LEAD AND BACK-UP COUNSEL.....	70

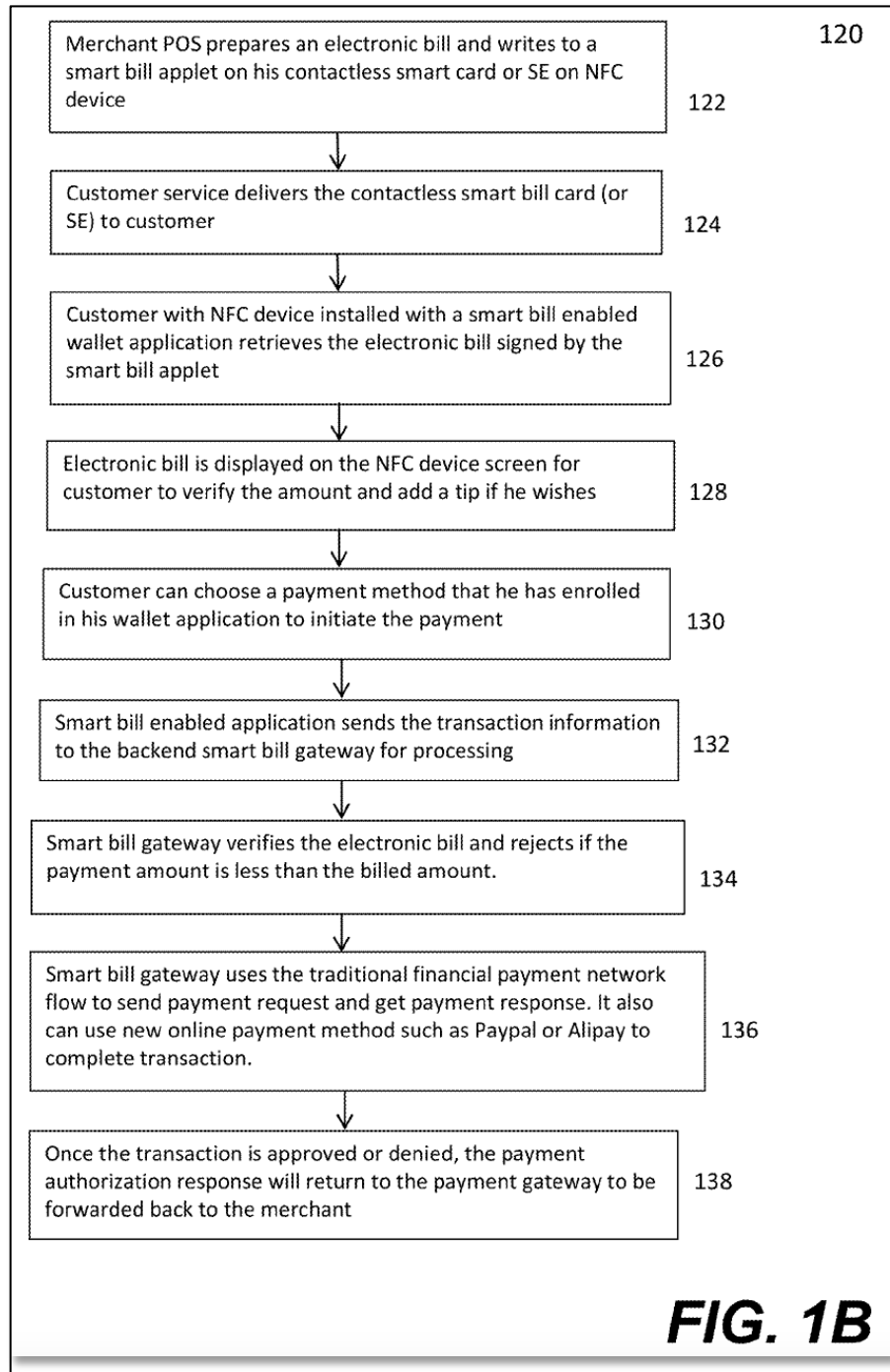
## **I. INTRODUCTION**

Petitioner Apple Inc. (“Petitioner”) requests *Inter Partes* Review (“IPR”) of Claims 1-5, 12-14, and 17-18 (the “Challenged Claims”) of U.S. Patent No. 10,600,046 (the “’046 Patent”).

## **II. THE ’046 PATENT**

### **A. The ’046 Patent’s Alleged Invention**

The ’046 Patent is generally directed to a mobile device that allows a user to accept and settle charges reflected in an electronic invoice. *’046 Patent* (Ex. 1001), Abstract, 1:15-21. To do this, the patent proposes that the mobile device includes a smart bill payment application. *Id.*, 6:58-62. Figure 1B below depicts a “process . . . of settling a payment according to one embodiment of the present invention” where a “smart bill” is generated by the restaurant’s point of sale (POS) device and is presented to a customer’s mobile device that has been provisioned with a smart bill payment application:



*Id.*, Fig. 1B, 7:4-8:24 (describing the individual steps represented in Fig. 1B).

The '046 Patent describes two ways in which the electronic bill may be provided to the customer: (1) via a contactless smart card or (2) via the POS device

itself. Fig. 1B depicts a scenario in which the electronic bill/invoice generated by the POS may be transferred to a contactless smart card (step 122), which is then delivered to the customer's table (step 124). *Id.*, 7:19-28. Alternatively, the POS device is directly presented to the customer and the electronic bill is retrieved by the mobile device with the installed payment application. *Id.*, 6:6-23. Upon presenting the customer with the electronic invoice, the invoice is displayed (steps 126-128) and the user chooses a payment method (e.g., credit card, debit card, or e-purse) (step 130). *Id.*, 7:26-53. The mobile device then sends transaction information to a payment gateway for processing (step 132), and the payment gateway verifies the electronic invoice and either approves or denies the transaction (steps 134-138). *Id.*, 7:10-8:24.

### **B. The '046 Patent's Priority Date**

The '046 Patent claims priority to the following applications:

- U.S. App. 11/534,653 (“the '653 Application”) filed on September 24, 2006.
- U.S. App. 13/350,832 (“the '832 Application”)—a continuation-in-part—filed on January 16, 2012.
- U.S. Provisional 61/618,802 (“the '802 Provisional”) filed on April 1, 2012.
- U.S. App. 13/853,937 (“the '937 Application”)—another continuation-in-part—filed on March 29, 2013.
- U.S. App. 14/728,349 (“the '349 Application”) filed on June 2, 2015.

For purposes of establishing PGR eligibility, Google argued in PGR2021-00029 that certain '046 Patent claims are not entitled priority claims before March

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