

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

RFCYBER CORP.,

Plaintiff,

v.

APPLE INC.,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Case No. 6:21-cv-00916-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF RICHARD M. COWELL IN SUPPORT OF  
PLAINTIFF RFCYBER CORP.'S  
RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Richard M. Cowell, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am Counsel with the law firm of Fabricant LLP and counsel of record for Plaintiff RFCyber Corp. in this matter.

3. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.

4. Attached hereto as Exhibit A is a true and correct copy of a document entitled Dictionary of Banking and Finance third edition, bearing Bates numbers RFC-APPLE00000048 through RFC-APPLE00000051.

5. Attached hereto as Exhibit B is a true and correct copy of a document entitled Newton's Telecom Dictionary bearing Bates Nos. RFC-APPLE00000052 through RFC-APPLE00000054.

6. Attached hereto as Exhibit C is a true and correct copy of Paper No. 1, Petition for *Inter Partes* Review of U.S. Patent No. 9,189,787 in *Apple Inc. v. RFCyber Corp.*, IPR2022-00412, dated January 14, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 10, 2022 in Cranford, New Jersey.

/s/ Richard M. Cowell  
Richard M. Cowell