

EXHIBIT B

Appendix B – Claim Chart for US Patent No. 8,448,855 Against Accused Ap

Based on information presently available, RFCyber Corp. (“RFCyber”) contends that Defendant Apple Inc. (“Ap of U.S. Patent No. 8,448,855 (the “855 Patent”) through the Accused Products which are manufactured, sold, of

The Accused Products include at least all devices running or containing Apple Wallet, Apple Pay and/or Apple C functionality related thereto.

For example, the Accused Products include, but are not limited to, the following Accused Devices: and all versio or Apple silicon, made, sold, offered for sale, used, or imported in the United States since the launch of Apple iPhone 6, iPhone 6 Plus, iPhone 6s, iPhone 6s Plus, iPhone SE (1st generation), iPhone 7, iPhone 7 Plus, iPhone 8 iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, iPhone SE (2nd generation), iPhone 12 mini, iPhone 12, iPhone Pro, iPhone 13 Pro Max, Apple Watch (1st generation), Apple Watch Series 1, Apple Watch Series 2, Apple W Watch SE, Apple Watch Series 6, Apple Watch Series 7, iPad (4th generation), iPad (5th generation), iPad (6th generation), iPad mini 2, iPad mini 3, iPad mini 4, iPad mini (5th generation), iPad mini (6th generation), iPad A (12.9-inch), iPad Pro (9.7-inch), iPad Pro (12.9-inch) (2nd generation), iPad Pro (10.5-inch), iPad Pro (11-inc generation), iPad Pro (12.9-inch) (4th generation), MacBook Air (Retina, 13-inch, 2018), MacBook Air (Retina Air (M1, 2020), MacBook Pro (13-inch, 2016, Four Thunderbolt 3 ports), MacBook Pro (15-inch, 2016), MacE (15-inch, 2017), MacBook Pro (13-inch, 2018, Four Thunderbolt 3 ports), MacBook Pro (15-inch, 2018), MacE (15-inch, 2019), MacBook Pro (16-inch, 2019), MacBook Pro (13-inch, 2020, Four Thunderbolt 3 ports), MacB M1, 2021), MacBook Pro (16-inch, 2021), and MacBook Pro (14-inch, 2021). RFCyber reserves the right to am

For example, the Accused Products include, but are not limited to, the following Accused Apps: Apple Wallet, A

Apple directly infringes each of the Asserted Claims by importing, using, selling, and/or offering to sell the Acc are preloaded with apps required to use Accused Services.

Apple indirectly infringes the Asserted Claims in violation of 35 U.S.C. § 271(b) by inducing third parties, inc their operation and use of the Accused Products. Apple has knowingly and intentionally induced this direct infrin the Accused Products to third parties with the intent that the Accused Products will be operated and used in a advertising the Accused Products. Apple’s marketing and promotional materials for the Accused Products are fou offers customers downloadable User Manuals for the Accused Products that instruct customers to, among other th further provides tutorials with the Accused Products that instruct customers to, among other things, use the Acc support to customers, including instruction to, among other things, use Apple Pay and Apple Cash to perform tra

will result in infringement of the Asserted Claims, or subjectively believes that there is a high probability that it taken deliberate actions to avoid learning these facts.

Apple also contributorily infringes each of the Asserted Claims in violation of 35 U.S.C. § 271(c) by selling, imp directly infringe the Asserted Claims. The Accused Products constitute a material part of the Asserted Claims.

The following chart identifies specifically where each limitation of each Asserted Claim is found within the A meet the limitation in the Apple iPhone 13 Pro installed with Apple Pay. On information and belief, the Apple iP the Asserted Claims in a manner consistent with the Apple iPhone 13 Pro.

RFCyber does not concede that any claims of the '855 Patent that are not listed below are not infringed by th documents and other information below are intended to be exemplary only and in no way foreclose RFCyber f code, and/or testimony at a later time. These contentions are preliminary in nature, and an analysis of Apple's pr relevant witnesses may more fully and accurately describe the infringing features of its Accused Products. Acco and/or amend these contentions once such additional information is made available to RFCyber. Furthermore, amend these contentions as discovery in this case progresses; in view of the Court's claim construction order(s); to, positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation a

To the extent Apple contends that any element of the Accused Products is attributable to a third party, RFCyber constitute direct infringement by Apple under 271(a). The acts may be attributable to Apple because Apple dire other entity form a joint enterprise. *Akamai Techs., Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020, 1022 (Fed. C of these other entities. *Centillion Data Sys., LLC v. Qwest Commc'ns Int'l, Inc.*, 631 F.3d 1279, 1286 (Fed. Cir. 201 distributors, and users of the Accused Products consumers), are attributable to Apple because Apple (1) condit performance of one or more steps of a patented method, and (2) establishes the manner or timing of that perform 1357, 1365 (Fed. Cir. 2017). These acts are also attributed to Apple because it initiated the activities of its end-u (Fed. Cir. 2010).


Claim	Apple Accused Product
1[p]. A method for funding an e-purse, the method comprising:	Every iPhone and Apple Watch performs a method for funding an e-purse as claimed in 1[p]. For example, every Accused Product performs a method for funding Apple Pay and/or Apple Wallet during operations associated with credit, debit, loyalty, membership, and other payment cards. For example, every Accused Product funds Apple Pay and/or Apple Wallet during operations associated with credit, debit, loyalty, membership, and other payment cards. For example, every Accused Product funds Apple Pay and/or Apple Wallet during operations associated with stored value cards such as gift cards, loyalty cards, membership cards, and other payment cards.

1[a] receiving a PIN from a user of a portable device, wherein the portable device is a near field communication (NFC) enabled device that includes a card module;

Every accused smartphone and smartwatch product performs the step of receiving a PIN from a near field communication (NFC) enabled device that includes a card module.

Every iPhone and Apple Watch is a near field communication (NFC) enabled device that includes a card module.

For example, the Apple iPhone 13 Pro is a portable device that is NFC enabled.

-  KIOXIA 256 GB NAND Flash
-  Apple/Cirrus Logic Audio Codec
-  NXP SN210 NFC & Secure Element
-  Apple/Cirrus Logic Audio Amplifier
-  Apple/Cirrus Logic Power Conversion

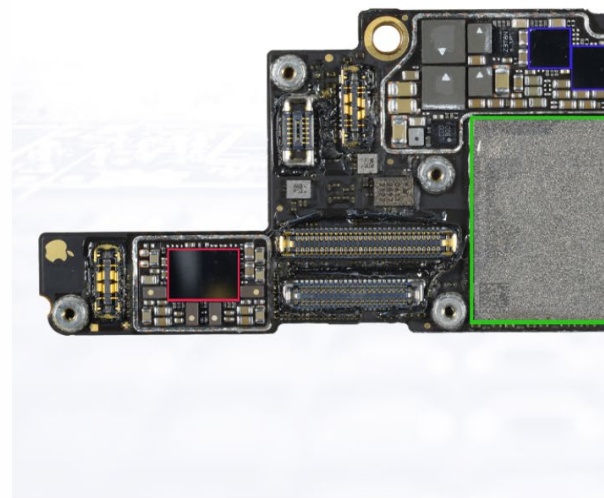


Figure 2. Apple iPhone Pro Board Shot

<https://www.techinsights.com/blog/teardown/apple-iphone-13-pro-teardown>

For example, the iPhone 13 Pro receives a PIN (e.g. a passcode or biometric information) and/or peer-to-peer transactions.

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