EXHIBIT C

Appendix C – Claim Chart for US Patent No. 9,189,787 Against Accused A

Based on information presently available, RFCyber Corp. ("RFCyber") contends that Defendant Apple Inc. ("Ap of U.S. Patent No. 9,189,787 (the "'787 Patent") through the Accused Products which are manufactured, sold, of

The Accused Products include at least all iPhones and Apple watches running or containing Apple Wallet, Apple servers providing functionality related thereto.

For example, the Accused Products include, but are not limited to, the following Accused Devices: and all versic sale, used, or imported in the United States since the launch of Apple Pay in October 2014, including at least all 6s Plus, iPhone SE (1st generation), iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X, iPhone XR, iPh Max, iPhone SE (2nd generation), iPhone 12 mini, iPhone 12, iPhone 12 Pro, iPhone 12 Pro Max, iPhone 13 mi generation), Apple Watch Series 1, Apple Watch Series 2, Apple Watch Series 3, Apple Watch Series 4, Apple V Watch Series 7. RFCyber reserves the right to amend this list of Accused Devices as discovery progresses.

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 Accu 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 Ac...
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 '787 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 Prod
1. A portable device for commerce, the portable device comprising:	Every Accused Product comprises a portable device for commerce. For example, the iPhone 13 Pro includes a system for commerce, *e.g.* Apple Pay and/o

| 1[a] an emulator loaded in a smart card module for storing security values and updated transaction logs, and an e-purse applet to cause the portable device to function as an electronic purse (e-purse), | Every Accused Product comprises an emulator loaded in a smart card module for storir to cause the portable device to function as an electronic purse (e-purse).

For example, the iPhone 13 Pro includes or communicates with a smart card, such as, b Module, secure element, processor, microcontroller, and/or memory. For example, the such as a smart card comprising an NXP SN210, which includes an NFC controller an

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
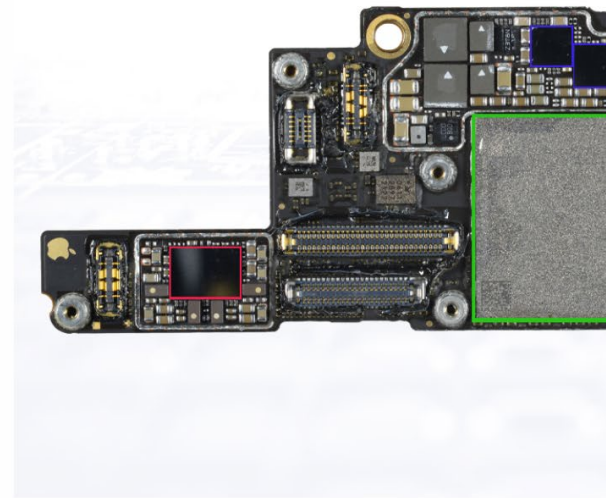
Figure 2. Apple iPhone Pro Board Shot

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

For example, the Accused iPhone 13 Pro further includes and/or communicates with a element, Flash memory (*e.g.* KIOXIA NAND Flash) or RAM memory (*e.g.* LPDDR4X as Flash, RAM, ROM, and/or EEPROM. |

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[1] RFCyber uses exemplary documentation for the PN80T, PN553, and NXP SE050 Secure Element as representa Apple Mobile Devices.

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