EXHIBIT D

Appendix D - Claim Chart for US Patent No. 9,240,009 Against Accused Ap

Based on information presently available, RFCyber Corp. ("RFCyber") contends that Defendant Apple Inc. ("Ap of U.S. Patent No. 9,240,009 (the "'009 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, iPhone SE (2nd generation), iPhone 12 mini, iPhone 12, iPhone 12 Pro, iPhone 12 Pro Max, iPhone 13 min generation), Apple Watch Series 1, Apple Watch Series 2, Apple Watch Series 3, Apple Watch Series 4, Apple 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 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 infrinted 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 four offers customers downloadable User Manuals for the Accused Products that instruct customers to, among other the further provides tutorials with the Accused Products that instruct customers to, among other things, use the Accused Products that instruct customers, including instruction to, among other things, use Apple Pay and Apple Cash to perform travell 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 Acmeet the limitation in the Apple iPhone 13 Pro installed with Apple Pay. On information and belief, the Apple iPhone Asserted Claims in a manner consistent with the Apple iPhone 13 Pro.

RFCyber does not concede that any claims of the '009 Patent that are not listed below are not infringed by the documents and other information below are intended to be exemplary only and in no way foreclose RFCyber for code, and/or testimony at a later time. These contentions are preliminary in nature, and an analysis of Apple's procedurant witnesses may more fully and accurately describe the infringing features of its Accused Products. Accordand/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 as

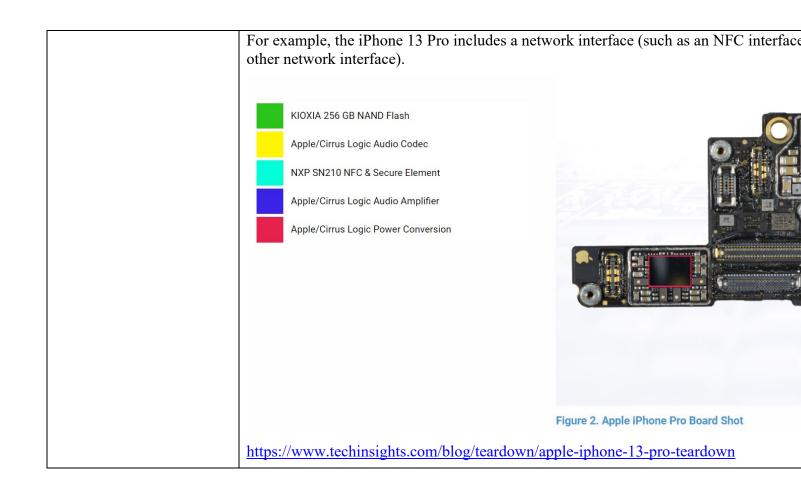
To the extent Apple contends that any element of the Accused Products is attributable to a third party, RFCyber constitute direct infringement by Apple under 271(a). The acts may be attributable to Apple because Apple direct other entity form a joint enterprise. *Akamai Techs., Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020, 1022 (Fed. Confidence other entities. *Centillion Data Sys., LLC v. Qwest Commc'ns Int'l, Inc.*, 631 F.3d 1279, 1286 (Fed. Cir. 2016) distributors, and users of the Accused Products consumers), are attributable to Apple because Apple (1) conditions 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-to-fed. Cir. 2010).

Claim	Apple Accused Prod
1. A mobile device for conducting a secured transaction over a network,	Every Accused Product comprises a mobile device for conducting a secured transaction
the mobile device comprising:	For example, the Apple iPhone 13 Pro conducts secured transactions (such as contactle such as the internet, using Apple Pay, Apple Wallet, and/or Apple Cash.



Apple Pay security and privacy over Learn how Apple protects your personal information, transaction information when you use Apple Pay. Apple Pay allows you to make easy, secure, and private transactions in stores You can also send and receive money with friends and family using Apple Pay with contactless rewards cards in Wallet, you can receive and redeem reward Apple Pay. Apple Pay is designed with your security and privacy in mind, mak secure way to pay than using your physical credit, debit, and prepaid cards. Apple Pay uses security features built-in to the hardware and software of you transactions. In addition, to use Apple Pay, you must have a passcode set on Face ID or Touch ID. You can use a simple passcode, or you can set a more co greater security. Apple Pay is also designed to protect your personal information. Apple doesn original credit, debit, or prepaid card numbers that you use with Apple Pay. A with credit, debit, or prepaid cards, Apple doesn't retain any transaction infor to you—your transactions stay between you, the merchant or developer, and https://support.apple.com/en-us/HT203027 1[a] a network interface; Every Accused Product comprises a network interface.





DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

