

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 versio 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 min 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 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.

Apple Pay security and privacy overview

Learn how Apple protects your personal information, transaction information, and payment information when you use Apple Pay.

[Apple Pay](#) allows you to make easy, secure, and private transactions in stores and online. You can also send and receive money with friends and family using [Apple Pay](#). When you use [Apple Pay](#) with contactless rewards cards in Wallet, you can receive and redeem rewards with [Apple Pay](#). [Apple Pay](#) is designed with your security and privacy in mind, making it a more 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 your iPhone, iPad, or Mac. In addition, to use [Apple Pay](#), you must have a passcode set on your device, and you must use [Face ID](#) or [Touch ID](#). You can use a simple passcode, or you can set a more complex passcode for greater security.

[Apple Pay](#) is also designed to protect your personal information. Apple doesn't store your original credit, debit, or prepaid card numbers that you use with [Apple Pay](#). And unlike transactions with credit, debit, or prepaid cards, Apple doesn't retain any transaction information. All transactions are made directly to you—your transactions stay between you, the merchant or developer, and Apple.

<https://support.apple.com/en-us/HT203027>

1[a] a network interface;

Every Accused Product comprises a network interface.

For example, the iPhone 13 Pro includes a network interface (such as an NFC interface or other network interface).

-  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

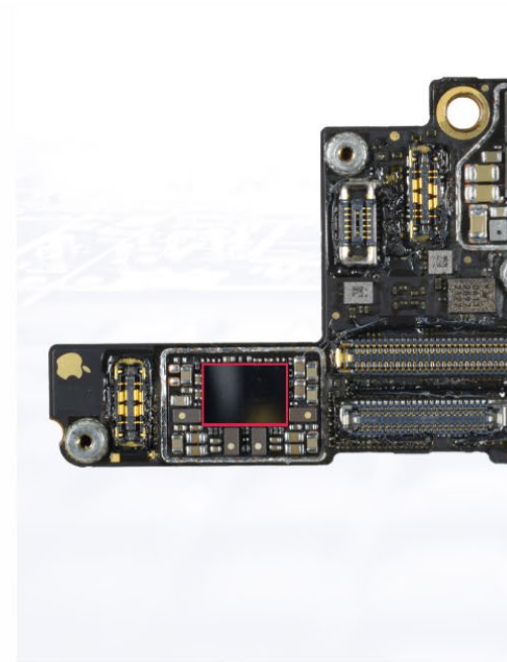


Figure 2. Apple iPhone Pro Board Shot

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

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