

# EXHIBIT E

**Appendix E – Claim Chart for US Patent No. 10,600,046 Against Accused A**

Based on information presently available, RFCyber Corp. (“RFCyber”) contends that Defendant Apple Inc. (“Apple”) (“Asserted Claims”) of U.S. Patent No. 10,600,046 (the “’046 Patent”) through the Accused Products which are manufactur

The Accused Products include at least all iPhones and Apple watches running or containing Apple Wallet, computer systems, and/or 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 m (1st generation), Apple Watch Series 1, Apple Watch Series 2, Apple Watch Series 3, Apple Watch Series 4, A 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 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 direc providing the Accused Products to third parties with the intent that the Accused Products will be operated (ii) marketing and advertising the Accused Products. Apple’s marketing and promotional materials for the A example, Apple’s website offers customers downloadable User Manuals for the Accused Products that instruct c Pay and Apple Cash. Apple further provides tutorials with the Accused Products that instruct customers to, amc Apple’s website also offers support to customers, including instruction to, among other things, use Apple Pay an Apple knows that its actions will result in infringement of the Asserted Claims, or subjectively believes that ther the Asserted Claims but has 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, i used directly infringe the Asserted Claims. The Accused Products constitute a material part of the Asserted Clai

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

RFCyber does not concede that any claims of the '046 Patent that are not listed below are not infringed by the Accused Products. The documents and other information below are intended to be exemplary only and in no way foreclose RFCyber from presenting additional evidence, code, and/or testimony at a later time. These contentions are preliminary in nature, and an analysis of Apple's Accused Products from relevant witnesses may more fully and accurately describe the infringing features of its Accused Products. RFCyber reserves the right to modify, and/or amend these contentions once such additional information is made available to RFCyber. Further, RFCyber reserves the right to and/or amend these contentions as discovery in this case progresses; in view of the Court's claim construction of the '046 Patent is limited to, positions on claim construction, invalidity, and/or non-infringement; and in connection with the preparation of the Accused Products.

To the extent Apple contends that any element of the Accused Products is attributable to a third party, RFCyber contends that such acts constitute direct infringement by Apple under 271(a). The acts may be attributable to Apple because Apple directly or indirectly through other entity form a joint enterprise. *Akamai Techs., Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020, 1022 (Fed. Cir. 2015) (acts of these other entities. *Centillion Data Sys., LLC v. Qwest Commc'ns Int'l, Inc.*, 631 F.3d 1279, 1286 (Fed. Cir. 2010) (acts of manufacturers, distributors, and users of the Accused Products consumers) are attributable to Apple because Apple (1) controls the performance upon others' performance of one or more steps of a patented method, and (2) establishes the manner or timing of the performance. *Inc.*, 845 F.3d 1357, 1365 (Fed. Cir. 2017). These acts are also attributed to Apple because it initiated the activity. *Inc.*, 845 F.3d 1319, 1330 (Fed. Cir. 2010).

Claim Element	Support
1. A method for mobile payment, the method comprising:	<p>Every Accused Product performs a method for mobile payment.</p> <p>For example, the Accused Apple iPhone 13 Pro performs a method of mobile payment, and/or Apple Cash.</p>

Claim Element	Support
	<div data-bbox="521 768 867 1465" data-label="Image"> </div> <div data-bbox="899 768 1300 808" data-label="Section-Header"> <h3>How to set up Apple Cash</h3> </div> <div data-bbox="899 821 1409 984" data-label="List-Group"> <ol style="list-style-type: none"> <li>1. Open the Settings app on your iPhone or iPad.</li> <li>2. Scroll down and tap Wallet &amp; Apple Pay.</li> <li>3. Turn Apple Cash on.</li> <li>4. Under Payment Cards, tap Apple Cash.</li> <li>5. Tap Continue, then follow the instructions on your screen.</li> </ol> </div> <div data-bbox="899 1003 1370 1085" data-label="Text"> <p>When someone sends you money, it's automatically and securely kept on your Apple Cash card. Your new Apple Cash card can be found in the Wallet app.</p> </div> <div data-bbox="899 1100 1406 1211" data-label="Text"> <p>If you want to set up Apple Cash for a family member that's under 18 years old, <a href="#">learn how to set up Apple Cash Family</a>. If you're under 18 years old, your Family Sharing organizer can set up Apple Cash for you with Apple Cash Family.</p> </div> <div data-bbox="899 1228 1412 1310" data-label="Text"> <p>If you turn off Apple Cash for any one device, you can still use Apple Cash on other devices where you're signed in with your Apple ID.</p> </div> <div data-bbox="516 1543 1037 1583" data-label="Section-Header"> <h3>What you can do with Apple Cash</h3> </div> <div data-bbox="521 1598 1118 1795" data-label="List-Group"> <ul style="list-style-type: none"> <li>• <a href="#">Add money</a> to Apple Cash.</li> <li>• <a href="#">Make purchases</a> using Apple Pay.</li> <li>• <a href="#">Send money to someone</a> in the Messages app.<sup>2</sup></li> <li>• <a href="#">Transfer money from Apple Cash</a> to your bank account.</li> <li>• <a href="#">Use your Apple Cash to make payments on your Apple Card balance</a>.</li> <li>• <a href="#">Receive Daily Cash from Apple Card purchases</a>.<sup>3</sup></li> </ul> </div> <div data-bbox="500 1824 1052 1860" data-label="Text"> <p><a href="https://support.apple.com/en-us/HT207886">https://support.apple.com/en-us/HT207886</a></p> </div>

Claim Element	Support
	<p><b>Learn more</b></p> <ul style="list-style-type: none"> <li>• There’s no fee to send, receive, or request money using Apple Cash.</li> <li>• Setting up Apple Cash doesn't affect your credit and won't be impacted by any credit.</li> <li>• To protect your account, you might be asked to verify your identity at certain points with Apple Cash. If you don't want to provide this information, you won't be able to use the features of Apple Cash. <a href="#">Learn how to verify your identity.</a></li> <li>• <a href="#">Learn about the minimum and maximum amounts</a> that you can send, receive, transfer, or request money using Apple Cash.</li> </ul> <hr/> <ol style="list-style-type: none"> <li>1. Sending and receiving money with Apple Pay and the Apple Cash card are services provided by Green Dot Bank, N.A. Member FDIC. <a href="#">Learn more about the Terms and Conditions.</a></li> <li>2. You can't use person to person payments with Apple Pay for any business-related activities, such as paying invoices or paying employees.</li> <li>3. Apple Card is issued by Goldman Sachs Bank USA, Salt Lake City Branch. Apple Card is available only in the United States.</li> </ol> <p>Information about products not manufactured by Apple, or independent websites not controlled or tested by Apple, is provided without endorsement. Apple assumes no responsibility with regard to the selection, performance, or use of third-party websites or products. Contact the vendor for additional information.</p> <p>Published Date: July 06, 2021</p> <p><a href="https://support.apple.com/en-us/HT207886">https://support.apple.com/en-us/HT207886</a></p>
<p>1[A]. causing a mobile device to capture data directly from a tag physically presented thereto, wherein the tag receives the data directly</p>	<p>Every Accused Product performs a method of causing a mobile device to capture data directly from a POS device and receives the data directly from a POS device and allows the mobile device to capture the data and settlement information with a merchant associated with the POS device.</p> <p>For example, Apple Pay and Apple Cash cause a mobile device, such as the Apple iPhone, to capture data directly from a POS device and receives the data directly from a POS device and allows the mobile device to capture the data and settlement information with a merchant associated with the POS device.</p>

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