

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

RFCyber CORP.,

Plaintiff,

v.

VISA U.S.A. Inc.,

Defendant.

CASE NO.: 6:22-cv-00697-ADA

JURY TRIAL DEMANDED

**DECLARATION OF LUCY YEN IN SUPPORT OF VISA U.S.A. INC.'S
OPPOSED MOTION TO STAY PENDING *INTER PARTES* REVIEW**

I, Lucy Yen, declare as follows:

1. I am an attorney with a pending application for admission to this Court *pro hac vice* and am admitted to practice in New York, California, and the District of Columbia. I am a Partner at the law firm of Wilson Sonsini Goodrich and Rosati, counsel for Defendant Visa U.S.A. Inc. (“Visa”) in the above-captioned matter. I provide this declaration in support of Visa’s Opposed Motion to Stay Pending *Inter Partes* Review. Unless otherwise indicated below, the statements in this declaration are based on my personal knowledge and my review of the documents cited herein. If called to testify as a witness, I could and would competently do so under oath.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Petition for *Inter Partes* Review of claims 1-19 of U.S. Patent No. 9,189,787, IPR2022-00412, Paper 1, dated January 14, 2022.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Petition for *Inter Partes* Review of claims 1-17 of U.S. Patent No. 9,240,009, IPR2022-00413, Paper 1, dated January 14, 2022.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Decision Granting Institution of the Patent Trial and Appeal Board for *Inter Partes* Review of claims 1-19 of U.S. Patent No. 9,189,787, IPR2022-00412, Paper 11, dated July 21, 2022.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Decision Granting Institution of the Patent Trial and Appeal Board for *Inter Partes* Review of claims 1-17 of U.S. Patent No. 9,240,009, IPR2022-00413, Paper 12, dated July 21, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief after reasonable investigation. Executed this 8 day of June 2023 in New York, New York.

/s/ Lucy Yen

Lucy Yen