

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

RFCyber CORP.,	)	CASE NO.: 6:22-cv-00697-ADA
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
VISA U.S.A. Inc.,	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

---

**DECLARATION OF LUCY YEN IN SUPPORT OF DEFENDANT’S  
OPENING CLAIM CONSTRUCTION BRIEF**

I, Lucy Yen, declare as follows:

1. I am an attorney admitted to this Court *pro hac vice* and admitted to practice in New York, California, and the District of Columbia. I am an attorney 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 Opening Claim Construction Brief. 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 Merriam-Webster’s Pocket Dictionary (1995) bearing bates numbers VISA\_USA\_00009145 – VISA\_USA\_00009148.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Random House Webster's College Dictionary (2000) bearing bates numbers VISA\_USA\_00009158 – VISA\_USA\_00009164.

4. Attached hereto as **Exhibit 3** is a true and correct copy of an excerpt to the patent prosecution history for Application No. 11/534,653, the Response to 1<sup>st</sup> OA (RCE), dated September 7, 2011, bearing bates numbers RFC00001013 – RFC00001024.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an excerpt to the patent prosecution history for Application No. 11/534,653, the Application, dated September 24, 2006, bearing bates numbers RFC00000802 – RFC00000833.

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 21st day of August 2023 in New York, New York.

/s/ Lucy Yen

Lucy Yen