

Inter Partes Reviews

U.S. Patent No. 9,208,488

U.S. Patent No. 10,438,196

Apple Inc. v. Fintiv, Inc., Cases IPR2023-00398 ('196) & IPR2023-00399 ('488)**

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Haynes Boone, LLP

**The '196 patent is a continuation of the '488 patent.



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Background on '488 & '196 Patents

(57)

ABSTRACT

Embodiments are directed to performing a transaction using a **third party mobile wallet**, performing a transaction using a **third party point of sale (POS) system** and to making a purchase from a **third party mobile wallet** provided by a third party mobile wallet provider. In one scenario, a **cloud-based transaction platform** is provided, which receives communication from **an agent terminal** over a communication channel connected to the cloud-based transaction platform. The agent communication indicates that a customer desires to perform a mobile wallet transaction using their **third party mobile wallet**. The **cloud-based transaction platform** sends the agent communication to a third party mobile wallet platform, receives communication from the third party mobile wallet platform confirming processing of the transaction, and sends communication to the **agent terminal** over a communication channel connected to the **cloud-based transaction platform**, where the communication indicates confirmation of the processing of the transaction.

APPL-1001 ('488), Abstract

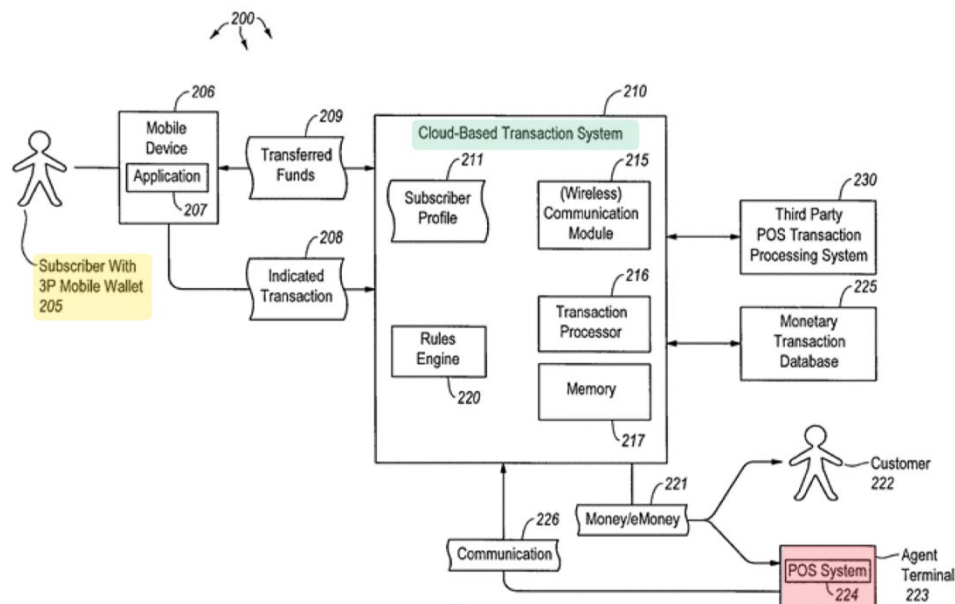


FIG. 2

APPL-1001, Fig. 2.

'488 patent, Abstract, 1:64-2:4, Fig. 2; '488 Pet., 2-3; '196 patent, Abstract, 2:4-9, Fig. 2; '196 Pet., 2-4.

Instituted Claims and Grounds

'488 IPR

VIII. THE DILL-VADHRI-AKASHIKA COMBINATION RENDERS CLAIMS 1-22 OBVIOUS

The combination of Dill, Vadhri, and Akashika renders claims 1-22 obvious.

'196 IPR

VIII. THE DILL-VADHRI-AKASHIKA COMBINATION RENDERS CLAIMS 1-22 OBVIOUS

As described below, the combination of Dill, Vadhri, and Akashika renders claims 1-22 obvious. APPL-1003, ¶45. These claims represent nothing more than a

- Patent Owner does not contest the teachings of Vadhri or Akashika with respect to the challenged claims.

'488 Pet., 5; '488 Inst. Dec., 3; '196 Pet., 6; '196 Inst. Dec., 8.

Disputed Claim Limitations

Claim 1 of '488 patent

1.3A – 1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types over a plurality of different communication channels,

* * * *

1.4

a notification services engine configured to interface with the integration tier and to send Short Message Peer-to-Peer (SSMP) messages, Short Messaging Service

* * * *

1.10A

the computing system sending communication to the agent terminal over one of a plurality of communication channels connected to the cloud-based transaction platform, the communication indicating confir-

Claim 1 of '196 patent

1.3A – 1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different device types over a plurality of different communication channels, the integration tier being configured to

* * * *

1.4

a notification services engine configured to interface with the integration tier and to send a plurality of corresponding different types of messages over the different communication channels to different devices, including

* * * *

1.12A

receive communication from the agent terminal over at least one of the plurality of channels connected to the computing system, the agent terminal communication

'488 patent, claim 1; '196 patent, claim 1.

Claim Construction

Mobile Wallet & Mobile Wallet Application

Mobile Device

Integration Tier...Including Web Services Communications Mechanisms

Web Services Communications Mechanisms

Different Communication Channels

Hardware SIM Card

Construction of “Mobile Wallet”

’488 Petition

disclosure. Petitioner maintains that all other terms, not addressed below, require no specific construction for this proceeding.³

“debiting the third party mobile wallet by the specified amount of funds”
(claims 8-10, 19-21)

’196 Petition

disclosure. Petitioner maintains that all other terms, not addressed below, require no specific construction for this proceeding.³

A. “debit the mobile wallet by the specified amount of funds” (claims 1, 16)

The Board’s construction of “mobile wallet” is correct.

On this record, we preliminarily determine that the term “mobile wallet” is a stored value account or prepaid access account that allows its owner to pay for goods and services. This construction is based on the Specification’s express definition of this term:

The term “mobile wallet” or “mobile wallet account” refers to a stored value account or prepaid access account (PPA) that allows the owner (or “subscriber”) to pay for goods and services on the mFS platform from his or her mobile wallet account.

Ex. 1001, 9:9–13; *see id.* at 6:30–35 (“mFS” refers to “mobile financial services”). Our construction is also consistent with the construction recently adopted by a district court. *See Fintiv, Inc. v. PayPal Holdings, Inc.*, 6:22-cv-00288, Dkt #60 (W.D. Tex.) (claim construction order; included in the

Construction of “Mobile Wallet Application” – ’488 Patent

Patent Owner’s construction is incorrect for the ’488 patent.

B. “Mobile Wallet Application”

Claim Term	Patent Owner’s Proposed Construction
“mobile wallet application” (Claims 1, 11 and 22)	“wallet application installed on a SIM card or elsewhere on a mobile device.”

’488 POR, 14

The Board’s construction of “mobile wallet application” is correct.

construction of this term. It does not matter whether a “mobile wallet application” as a general matter must be “installed on a SIM card or elsewhere on a mobile device” (Prelim. Resp. 10) because each claim of the ’488 patent includes an additional limitation that specifically requires the “mobile wallet application” to be “installed on the hardware SIM card.” Ex. 1001, 23:43–44 (claim 1), 26:41–43 (claim 11), 29:17–19 (claim 22).

Construction of “Mobile Wallet Application” – ’196 Patent

The parties agree on this term’s construction for the ’196 patent.

B. “Mobile Wallet Application”

Claim Term	Patent Owner’s Proposed Construction
“mobile wallet application” (Claims 1, 8, 16, 21, and 22)	“wallet application installed on a SIM card or elsewhere on a mobile device.”

’196 POR, 15

’196 patent

As used herein, a mobile wallet application is a mobile wallet application installed on a SIM card or elsewhere on a mobile device. The mobile wallet application may either be native (i.e. provided by the provider of the cloud-based transaction platform) or third party (i.e. provided by a provider other than the provider of the cloud-based transaction platform).

’196 patent, 7:14-20

’196 POR, 15; ’196 Inst. Dec., 13; ’196 patent, 7:14-20; ’196 Reply, 7.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Construction of “Mobile Device”

The parties agree on this term’s construction for both patents.

A. “Mobile Device”

<u>Claim Term</u>	<u>Patent Owner’s Proposed Construction</u>
“mobile device” (Claims 1, 11 and 22)	“physical device that is mobile, such as a phone or tablet”

’488 POR, 12

A. “Mobile Device”

<u>Claim Term</u>	<u>Patent Owner’s Proposed Construction</u>
“mobile device” (Claims 1, 8, 16, 21 and 22)	“physical device that is mobile, such as a phone or tablet”

’196 POR, 13

’488 POR, 12; ’488 Reply, 7; ’488 Inst. Dec., 10-11; ’196 POR, 13; ’196 Reply, 7; ’196 Inst. Dec., 11-12.

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches an Integration Tier Configured to Manage Mobile Wallet Sessions with a Mobile Device

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM

'196 Limitation 1.3A-13B

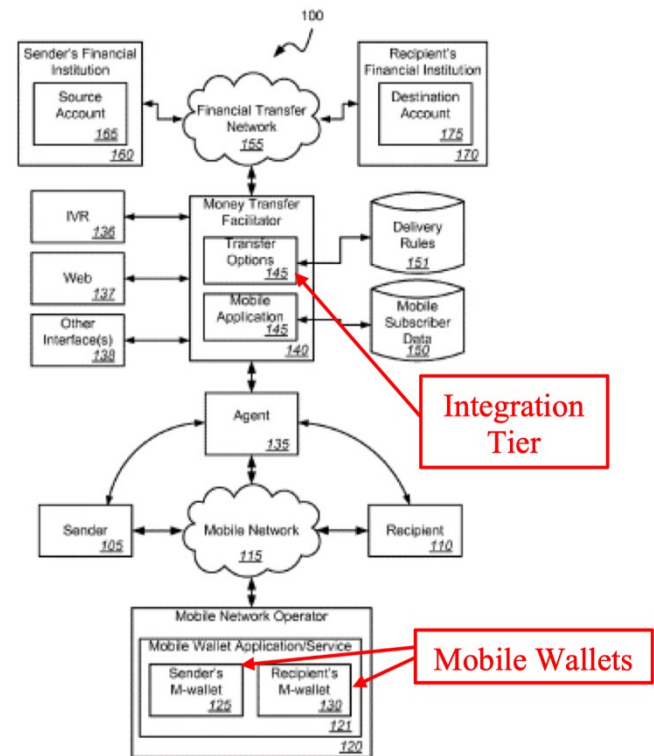
an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dill

[0053] The mobile network operator system 120 can include and/or execute a mobile wallet application 120 or service. Generally speaking, the mobile wallet application 121 maintains mobile wallets 125 and 130 for one or more subscribers, such as the sender 105 and/or recipient 110 to the mobile wallet service 121. The mobile wallets 125 and 130

[0100] FIG. 9 is a block diagram illustrating another exemplary system for making financial transfers according to one embodiment of the present invention. Generally speaking, the system 100 illustrated here can comprise a system as described above with reference to FIG. 1 and can include some or all of the same components and may perform some or all of the same functions. For example, the system 100 can include a money transfer facilitator system 140 as described above that may be adapted to receive transaction information from a mobile wallet application 121 via a mobile network 115 as described in detail above.

Dill



APPL-1005, Fig. 9 (annotated).

Dill Teaches an Integration Tier Managing Mobile Wallet Sessions with Mobile Devices Executing Mobile Wallet Applications

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM

'196 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dill

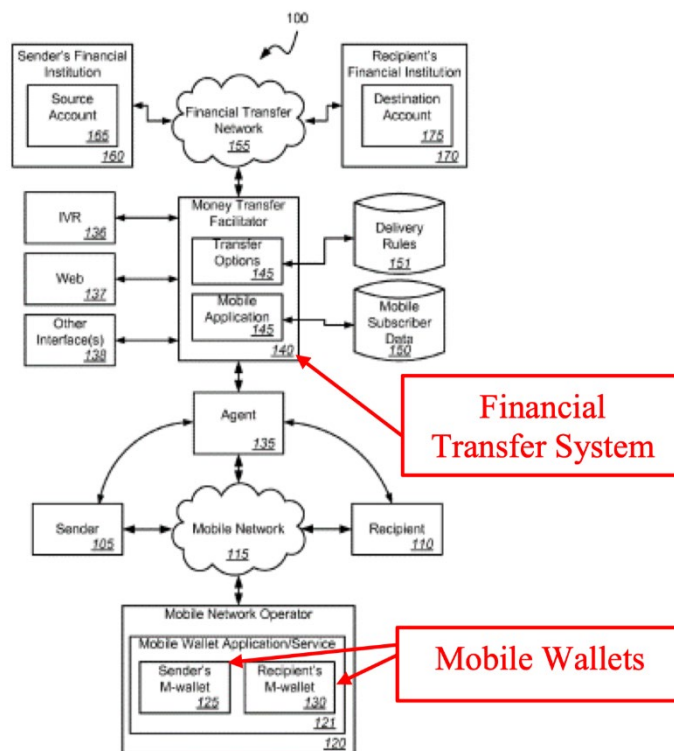
[0057] Such a system 100 allows a money transfer facilitator 140, using a unique customer identifier and internal and/or external mapping databases 150, to provide a structured settlement between unrelated entities such as the sending mobile wallet 125 and receiving mobile wallet 130, or between the sending cash retail location and receiving mobile wallet 130. It need not be a closed-loop system that allows

[0010] According to another embodiment, a system can comprise a mobile communications network and a mobile device communicatively coupled with the mobile communications network. The mobile device can execute a mobile wallet application. The mobile wallet application can be

a mobile device communicatively coupled with the mobile communications network and executing a mobile wallet application, the mobile wallet application adapted to

Dill, claim 13

Dill



APPL-1005, Fig. 9 (annotated).

Claim Construction

Mobile Wallet & Mobile Wallet Application

Mobile Device

Integration Tier...Including Web Services Communications Mechanisms

Web Services Communications Mechanisms

Different Communication Channels

Hardware SIM Card

“Integration Tier...Including Web Services Communications Mechanisms” Means Integration Tier Interfaces with Web Services

’488 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

- The integration tier 101 and notification services 102 can be configured with a web services API.
- The notification services are external to the integration tier.
- Web services API are external to the integration tier.

ity of financial transactions. Integration tier 101 can also include a communication (e.g., Web services) API and/or other communication mechanisms to accept messages from channels 111. Other mechanisms include, but are not limited

’488, 9:48-51; ’196, 9:65-10:1

* * * *

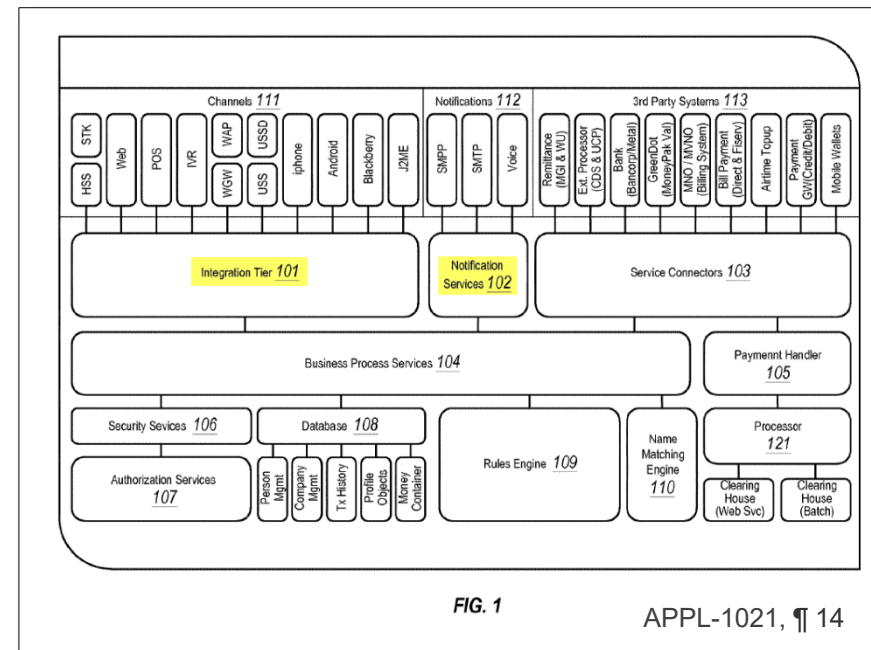
emails. Notification services 102 can be configured through a web services API.

’488, 9:62-63; ’196, 10:12-13

’196 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

’488 & ’196 patents



’488 Reply, 1-3; ’196 Reply, 2-3; ’488 patent, 9:48-63, Fig. 1; ’196 patent, 9:65-10:13, Fig. 1; APPL-1021, ¶ 12-15.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Patent Owner's Construction of "Integration Tier...Including Web Services Communications Mechanisms" is Wrong

'488 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

- '488 & '196 patents do not require web services API to be part of the integration tier.

'196 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dr. Shamos' Incorrect Construction

19. Each Challenged Claim recites an "integration tier ... including web services communication mechanisms for interfacing with" By the plain and ordinary meaning of "including," this limitation requires that the web services communication mechanisms be included in (i.e., are part of) the integration tier, meaning that the integration tier provides the web services communication mechanisms. This is true for the simple reason that no other element of the Challenged Claims is recited as providing the web services communication mechanisms.

Ex.2003, ¶ 19

Dr. Houh

15. Therefore, it is my opinion that a POSITA would have understood the plain and ordinary meaning of this term to mean that the integration tier interfaces with the claimed "web services communication mechanisms," where the "web services communication mechanisms" may be external to the integration tier.

APPL-1021, ¶ 15

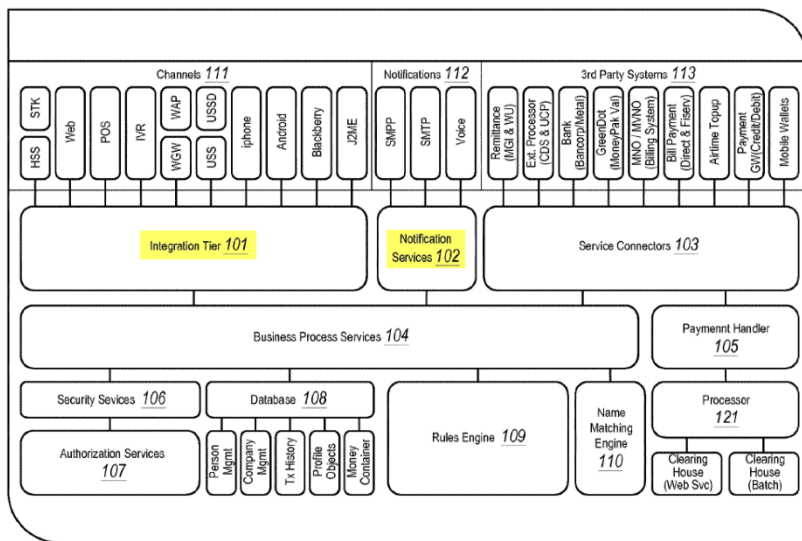


FIG. 1

APPL-1021, ¶ 14

'488 Reply, 1-3; '196 Reply, 2-3; '488 patent, 9:48-63, Fig. 1; '196 patent, 9:65-10:13, Fig. 1; APPL-1021, ¶ 15; Ex.2003, ¶ 19.

The “Integration Tier” and Dill’s Transfer Options Module Both Interface with Web Services Communication Mechanisms

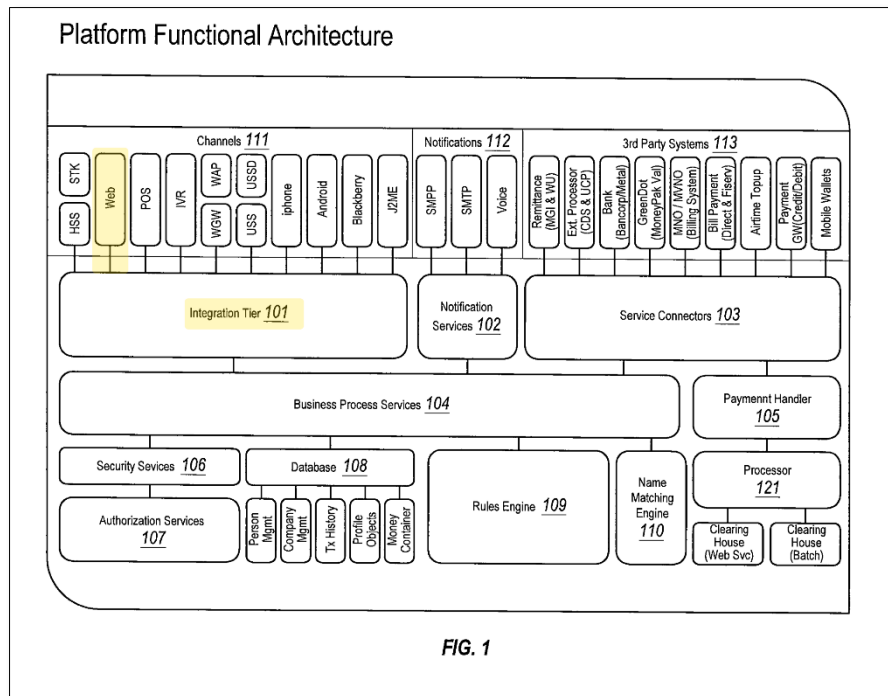
’488 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

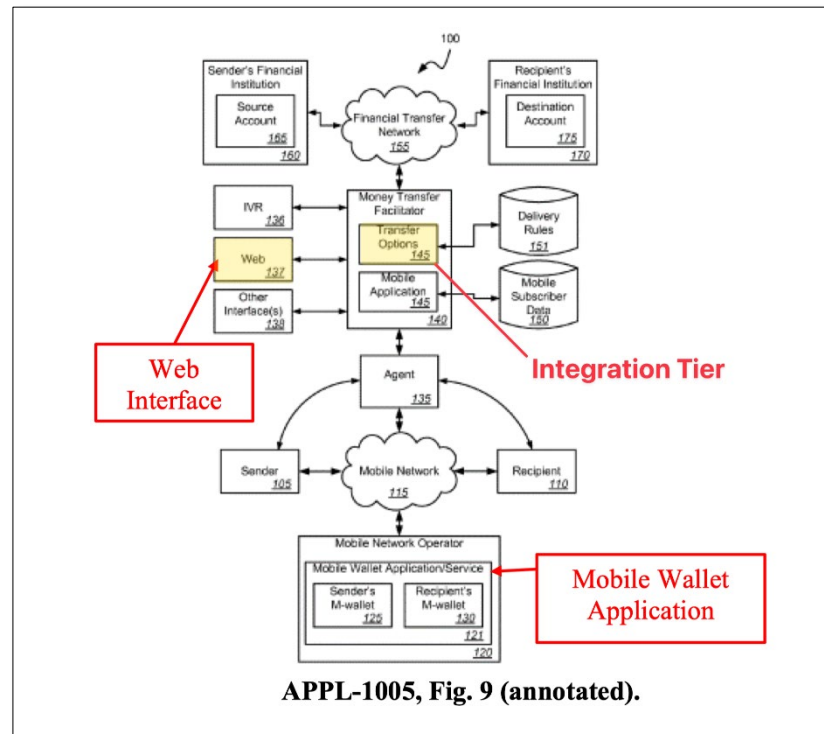
’196 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

’488 & ’196 patents



Dill



’488 Pet., 19-21, 22-23; ’196 Pet., 21-22, 24-25; ’488 Reply, 10-11; ’196 Reply, 8-9.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches an Integration Tier Including Web Services Communication Mechanisms

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM

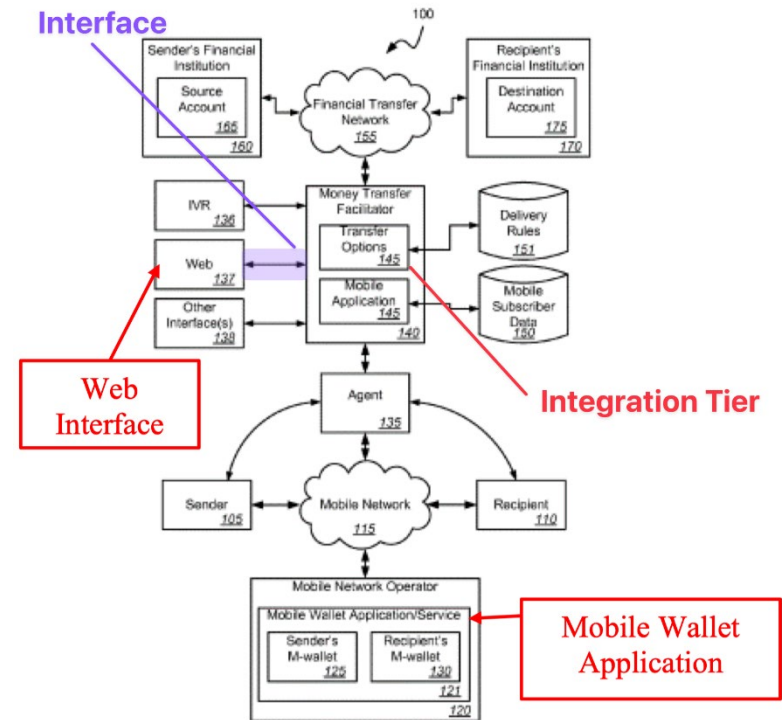
'196 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dill

[0101] As illustrated here, the money transfer facilitator system 140 can additionally or alternatively comprise one or more interfaces 136-138 for conducting money transfer transactions and a transfer options module 145 communicatively coupled with the one or more interfaces 136-138. For example, the one or more interfaces 136-138 can comprise at least one of an Interactive Voice Response (IVR) interface 136, a web interface 137, as well as or instead of an interface to an agent system 135, a telephone interface to a customer service representative, or other interfaces 138. The transfer options module 145 can be adapted to receive transaction information for a money transfer transaction from a sender 105 through at least one or the interfaces 136-138, provide a notification of the transaction to a recipient of the transaction, and select one or more delivery options for completing the money transfer transaction. For example, the delivery options

Dill



APPL-1005, Fig. 9 (annotated).

Claim Construction

Mobile Wallet & Mobile Wallet Application

Mobile Device

Integration Tier...Including Web Services Communications Mechanisms

Web Services Communications Mechanisms

Different Communication Channels

Hardware SIM Card

Dr. Shamos is Importing Unrequired Limitations for “Web Services Communications Mechanisms”

'488 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

'196 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

The specification contains only two instances of “web services,” not “web services communications mechanisms.”

ality of financial transactions. Integration tier 101 can also include a communication (e.g., Web services) API and/or other communication mechanisms to accept messages from channels 111. Other mechanisms include, but are not limited

'488, 9:48-51; '196, 9:65-10:1

emails. Notification services 102 can be configured through a web services API.

'488, 9:62-63; '196, 10:12-13

The claims and specification do not require Dr. Shamos' additional limitations:

- “a machine-to-machine interaction over the Internet using Web protocols”
- “a computer-to-computer function invoked automatically, and not at the request of the user”

'488 Reply, 3-5; '196 Reply, 3-5; APPL-1021, ¶ 16-22; Ex.2003 ('488), ¶ 45-46; Ex.2003 ('196), ¶ 28-29.

The Plain and Ordinary Meaning of “Web Services Communications Mechanisms”

’488 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

’196 Limitations 1.3A-1.3B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dr. Houh

23. Therefore, it is my opinion that a POSITA would have understood the plain and ordinary meaning of this term to only require the “web services communication mechanisms” to “interface with a mobile wallet application that resides on a mobile device.”

APPL-1021, ¶ 23

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches Web Services Communication Mechanisms Interfacing with a Mobile Wallet Application

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM

'196 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dill

For example, a sender **105** can access the services of the money transfer facilitator **140** via a web site of the money transfer facilitator **140** and initiate a money transfer from a source account **165** owned by the sender **105**. The recipient

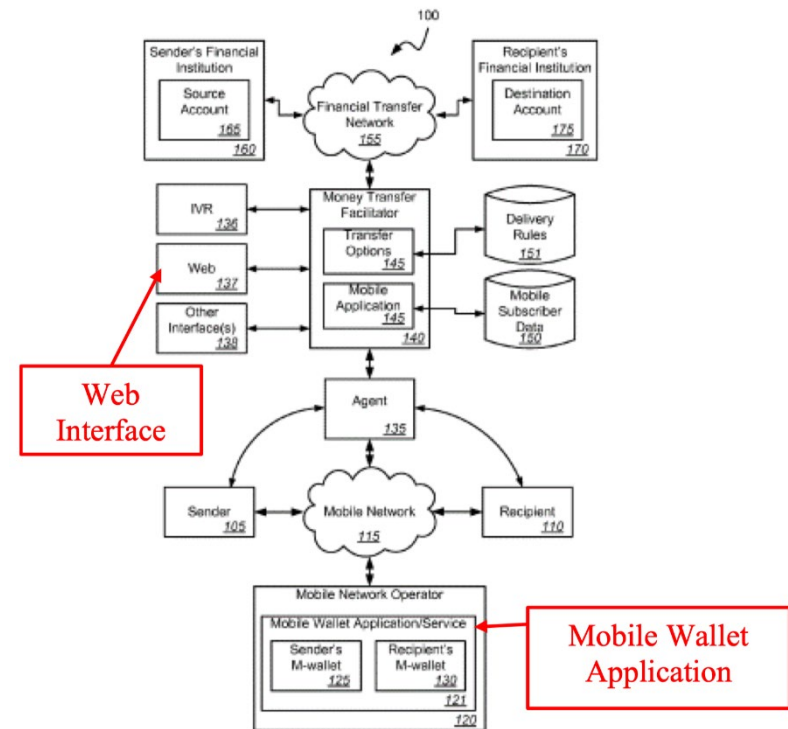
Dill, [0051]

all of the same functions. For example, the system **100** can include a money transfer facilitator system **140** as described above that may be adapted to receive transaction information from a mobile wallet application **121** via a mobile network **115** as described in detail above.

Dill, [0100]

[0101] As illustrated here, the money transfer facilitator system **140** can additionally or alternatively comprise one or more interfaces **136-138** for conducting money transfer transactions and a transfer options module **145** communicatively coupled with the one or more interfaces **136-138**. For example, the one or more interfaces **136-138** can comprise at least one of an Interactive Voice Response (IVR) interface **136**, a web interface **137**, as well as or instead of an interface to an agent system **135**, a telephone interface to a customer service representative, or other interfaces **138**. The transfer

Dill



APPL-1005, Fig. 9 (annotated).

Dill's Mobile Wallet Applications Conduct Transactions with Web Services

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM

'196 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different

Dill

For example, a sender 105 can access the services of the money transfer facilitator 140 via a web site of the money transfer facilitator 140 and initiate a money transfer from a source account 165 owned by the sender 105. The recipient

Dill, [0051]

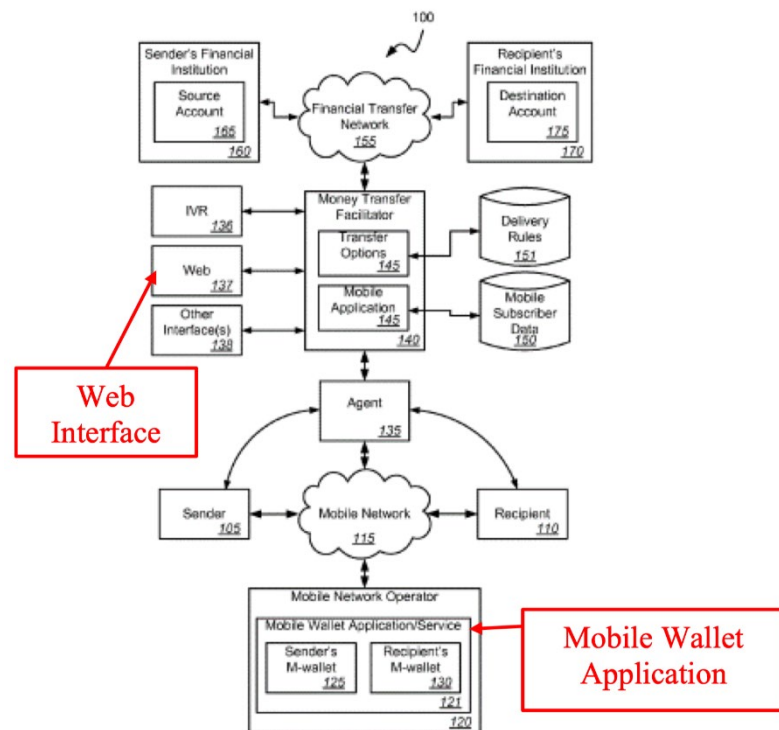
all of the same functions. For example, the system 100 can include a money transfer facilitator system 140 as described above that may be adapted to receive transaction information from a mobile wallet application 121 via a mobile network 115 as described in detail above.

Dill, [0100]

105 to the recipient 110. The money transfer facilitator 140 can receive the request to initiate the money transfer transaction from the mobile wallet application 121 of a mobile network operator 120, from a web site of the money transfer facilitator 140, from the agent 135, from a telephone money transfer service of the money transfer facilitator 140, from a kiosk, from an ATM or from another channel. The request can

Dill, [0054]

Dill



APPL-1005, Fig. 9 (annotated).

Claim Construction

Mobile Wallet & Mobile Wallet Application

Mobile Device

Integration Tier...Including Web Services Communications Mechanisms

Web Services Communications Mechanisms

Different Communication Channels

Hardware SIM Card

Patent Owner is Importing Unrequired Limitations for “Different Communication Channels”

'488 Limitations 1.3A-1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types over a plurality of different communication channels,

'196 Limitations 1.3A-1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different device types over a plurality of different communication channels, the integration tier being configured to

Patent Owner is importing unsupported limitations:

communication channels.” This limitation requires that the “different communication channels” (i) interface with the “web services communication mechanisms,” and (ii) connect the integration tier to different device types outside of the integration tier. Ex. 2003 at ¶ 21; *see also*, Ex. 1001 at 9:48-51 (“Integration

'488 POR, 11

The claims and specification do not require conditions (i) and (ii).

'488 Reply, 5-7; '196 Reply, 6-7; APPL-1021, ¶ 24-26; '488 POR, 11; '196 POR, 12.

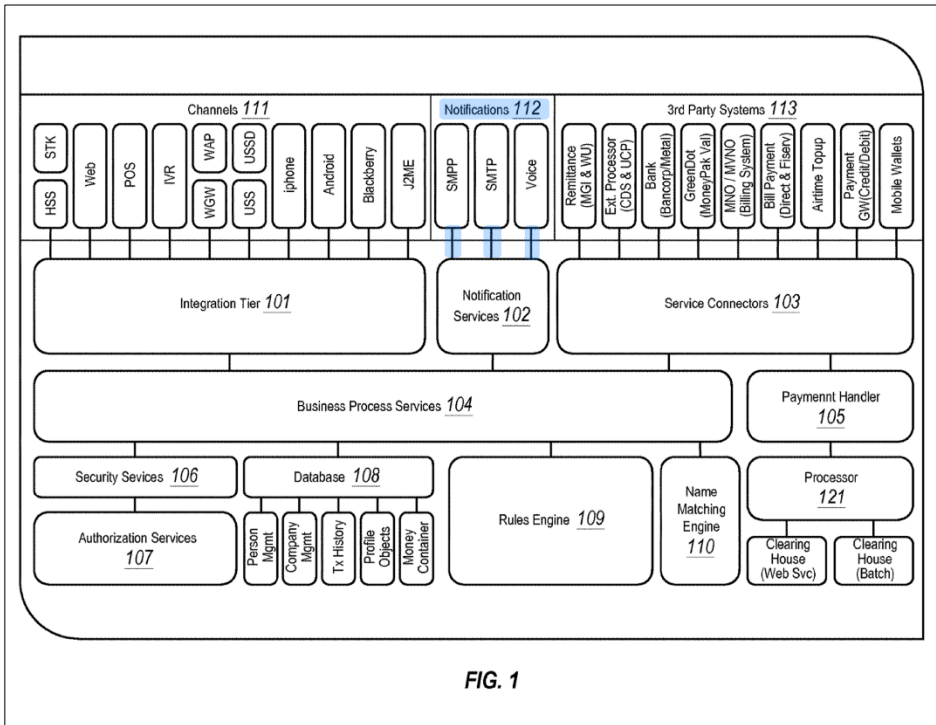
The Plain and Ordinary Meaning of “Different Communication Channels”

’488 Limitations 1.3A-1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types over a plurality of different communication channels,

’196 Limitations 1.3A-1.3C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different device types over a plurality of different communication channels, the integration tier being configured to



Dr. Houh

29. Therefore, it is my opinion that a POSITA would have understood the plain and ordinary meaning of this term to include within its scope communication channels that may not interface with the “web service communication mechanisms.” (e.g., notifications 112)

’488 Reply, 6-7; ’196 Reply, 6-7; APPL-1021, ¶ 28-29.

Dill Teaches Web Services Communication Mechanisms Interfacing with a Plurality of Different Devices Types Over Different Communication Channels

'488 Limitation 1.3A-13C

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types over a plurality of different communication channels,

'196 Limitation 1.3A-13C

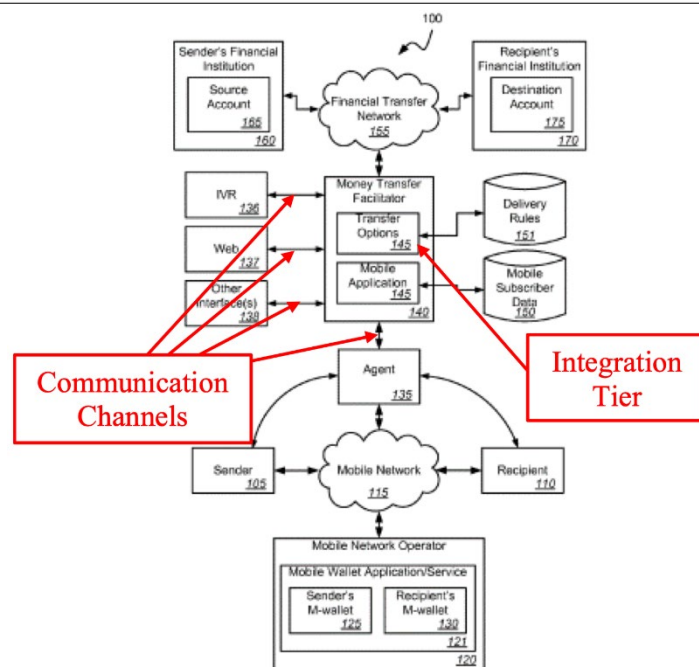
an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application and a plurality of different device types over a plurality of different communication channels, the integration tier being configured to

Dill's interfaces are to different device types.

[0101] As illustrated here, the money transfer facilitator system 140 can additionally or alternatively comprise one or more interfaces 136-138 for conducting money transfer transactions and a transfer options module 145 communicatively coupled with the one or more interfaces 136-138. For example, the one or more interfaces 136-138 can comprise at least one of an Interactive Voice Response (IVR) interface 136, a web interface 137, as well as or instead of an interface to an agent system 135, a telephone interface to a customer service representative, or other interfaces 138. The transfer

[0052] The system 100 can also include a mobile network 115, such as a cellular or other wireless network, communicatively coupled with the agent 135 and/or the money transfer facilitator 140. A mobile network operator system 120 can be communicatively coupled with the mobile network 115. As

Dill



APPL-1005, Fig. 9 (annotated).

Claim Construction

Mobile Wallet & Mobile Wallet Application

Mobile Device

Integration Tier...Including Web Services Communications Mechanisms

Web Services Communications Mechanisms

Different Communication Channels

Hardware SIM Card

Patent Owner's Construction of "Hardware SIM Card" is Wrong

'488 Limitations 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

Patent Owner's Unsupported Construction

Claim Term	Patent Owner's Proposed Construction
"hardware SIM card" (Claims 1, 11 and 22)	"secure, tamper-resistant chip on a mobile device that is separate from the mobile device's main memory that enables the mobile device to access the cellular network"

- These limitations are not required by the claims or defined in the specification.
- "SIM card" is mentioned 3 times in the specification without definition:

As used herein, a mobile wallet application is a mobile wallet application installed on a SIM card or elsewhere on a mobile device. The mobile wallet application may either be

'488, 7:1-3

banked) subscriber. The mobile wallet application is installed on a mobile device in the device's memory, on a SIM card (such as a GSM SIM card) or is otherwise accessible to the mobile device. The mobile wallet application provides the

'488, 9:33-36

phones. The mobile wallet application may be installed on the device's SIM card, or on the device's main memory. Accord-

'488, 12:12-13

'488 Reply, 8-9; APPL-1021, ¶¶ 34-36; '488 POR, 16; '488 patent, 7:1-3, 9:33-36, 12:12-13.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches a Mobile Wallet Application Installed on a Hardware SIM Card

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

Dill

13. A system comprising:
a mobile communications network;

a mobile device communicatively coupled with the mobile communications network and executing a mobile wallet application, the mobile wallet application adapted to

* * * *

described. It should also be appreciated that the methods described above may be performed by hardware components or may be embodied in sequences of machine-executable instructions, which may be used to cause a machine, such as a general-purpose or special-purpose processor or logic circuits programmed with the instructions to perform the methods. These machine-executable instructions may be stored on one or more machine readable mediums, such as CD-ROMs or other type of optical disks, floppy diskettes, ROMs, RAMs, EPROMs, EEPROMs, magnetic or optical cards, flash memory, or other types of machine-readable mediums suitable for storing electronic instructions. Alternatively, the methods may be performed by a combination of hardware and software.

Dill, [0106]

Dr. Houh

96. A POSITA would have understood that the “machine readable mediums” referred to by Dill to execute its systems includes a hardware SIM card, which is commonly used to execute code for mobile transactions in mobile devices, as evidenced by Bykov (APPL-1013):

Dill Teaches a Mobile Wallet Application Installed on a Hardware SIM Card

'488 Limitation 1.3A-13B

an integration tier configured to manage mobile wallet sessions with a mobile device and including web services communication mechanisms for interfacing with a mobile wallet application installed on a hardware SIM card as well as with a plurality of different device types

Bykov

[0027] A personal information exchange module according to embodiments may be implemented as a standardized module that can be easily plugged into any personal handheld device. For example, the personal information exchange module may be in SIM form, which is accepted by a majority of cellular phones today. Many personal handheld devices, such as PDAs, also include memory module slots where memory or similar modules may be plugged in.

[0028] In the example of a payment module, a module provided by a financial institution may execute sensitive code and store sensitive financial data with its appropriate security measures. A user may obtain this module from their financial institution and plug into a SIM card slot (if the module is in SIM form) of their cellular phone and use the phone for financial transactions transparent to the main functionality of the phone. Since the sensitive code and data is not transferred to the control of the phone's operating system, the module's integrity is protected and compatibility issues may be minimized by using standard APIs.

Dr. Shamos

Q. Okay. So let's use the example where I have a tablet and it has cellular capability and it connects to a website to make a transaction via the cellular network.

A. Oh, if it has cellular capability, then it has a SIM card. And then it would be a mobile device with a mobile wallet or at least with a mobile wallet application. Because I can't take that and stick it on my desktop. It relies on the unique characteristics of the mobile device.

APPL-1022, 28:25-29:9

* * * *

A. Yes, I do. If it has a cellular connection, it has a SIM card.

APPL-1022, 40:9-10

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches the Notification Services Engine

'488 Limitation 1.4A

a notification services engine configured to interface with the integration tier and to send Short Message Peer-to-

Dill's transfer options module and/or mobile application send notifications.

[0069] Upon receipt of the transfer request, the mobile application 145 of the money transfer facilitator 140 can initiate a money transfer send process which returns 345 a transaction identifier (e.g., Money Transfer Control Number (MTCN)) to the mobile wallet application 121 indicating that the transaction is available for payout. Additionally, the mobile application 145 of the money transfer facilitator 140 can send 350 a notification of the transaction and the availability of funds to the recipient 110.

* * * *

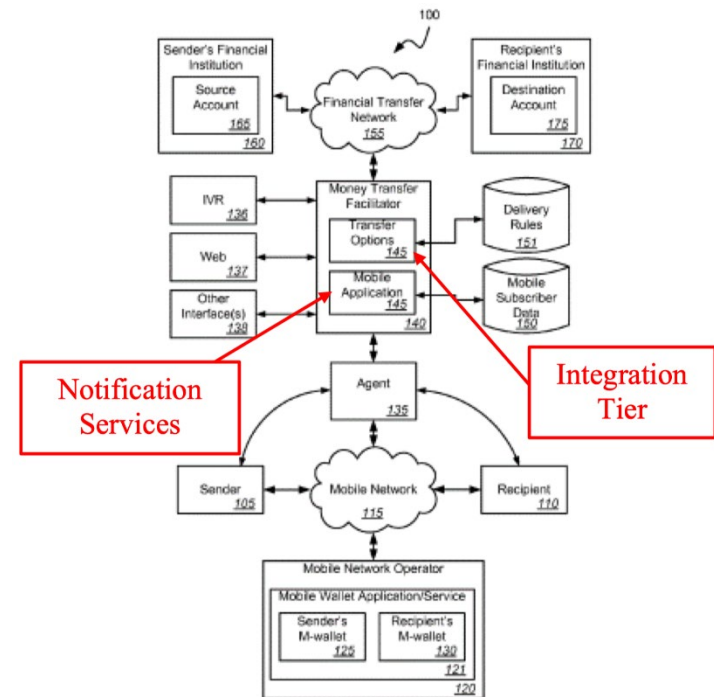
service representative, or other interfaces 138. The transfer options module 145 can be adapted to receive transaction information for a money transfer transaction from a sender 105 through at least one or the interfaces 136-138, provide a notification of the transaction to a recipient of the transaction, and select one or more delivery options for completing the money transfer transaction. For example, the delivery options

Dill, [0101]

'196 Limitation 1.4A

a notification services engine configured to interface with the integration tier and to send a plurality of corresponding different types of messages over the different

Dill



APPL-1005, Fig. 9 (annotated).

Dill Teaches the Notification Services Engine

'488 Limitation 1.4A

a notification services engine configured to interface with the integration tier and to send Short Message Peer-to-

Dr. Houh

113. Since both the mobile application 145 and transfer options module 145 of the money transfer facilitator 140 send notifications, a POSITA would have understood either of them to be a “notification services engine” as recited by the claim. For ease of explanation, the mobile application 145 is labeled as the notification services engine in Fig. 9 of Dill, below.

114. A POSITA would have also understood Dill’s broad notification language to mean that the various components of the money transfer facilitator interface with each other to send the notification:

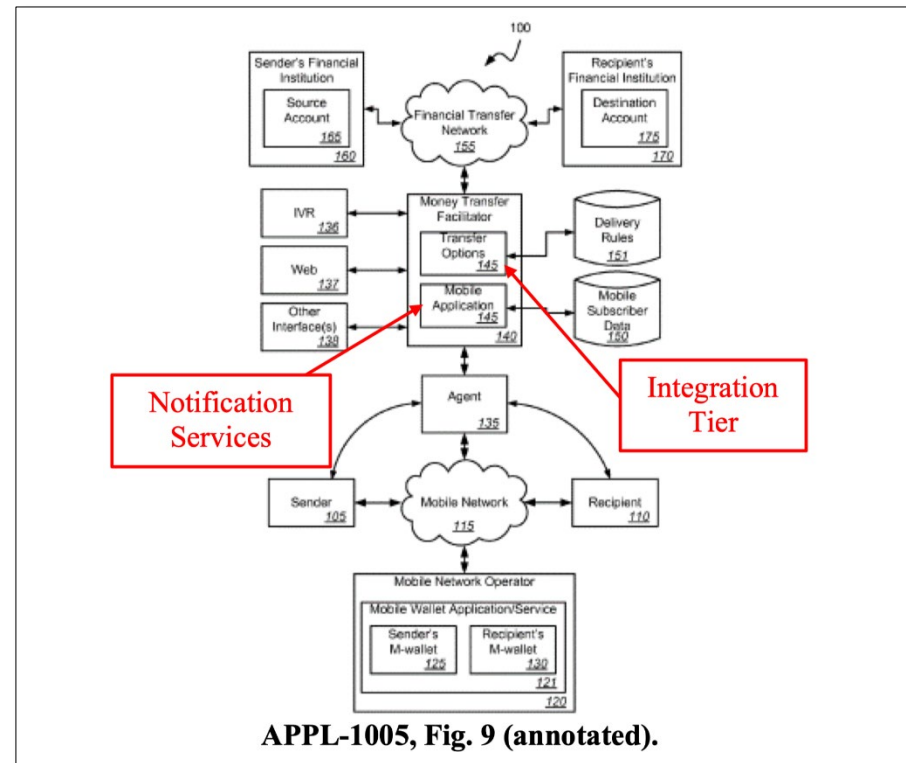
In any of these examples, transfers can be initiated by a sender through a channel appropriate to that sender, the transfer can be handled and directed by a money transfer facilitator 140, network operator, service provider, third-party, and/or other entities as appropriate for that channel, **notification can be directed to the recipient through a channel appropriate to that recipient**, and funds can be directed to a destination as determined as described above.

APPL-1005, [0090].

'196 Limitation 1.4A

a notification services engine configured to interface with the integration tier and to send a plurality of corresponding different types of messages over the different

Dill



'488 Pet., 27-28; '196 Pet., 29-30; APPL-1005, ¶ 90; '488 Reply, 13-14; '196 Reply, 12; APPL-1003 ('488), ¶¶ 113-114.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Claim Construction

Dill teaches the mobile wallet application & mobile device limitations

Dill teaches the claimed “integration tier”

Dill teaches the claimed “web services communication mechanisms”

Dill teaches a “mobile wallet application installed on a SIM card”

Dill teaches the claimed “notification services engine”

Dill teaches receiving communication from an agent terminal

Dill Teaches Receiving Communication from an Agent Terminal Over One of the Plurality of Communication Channels

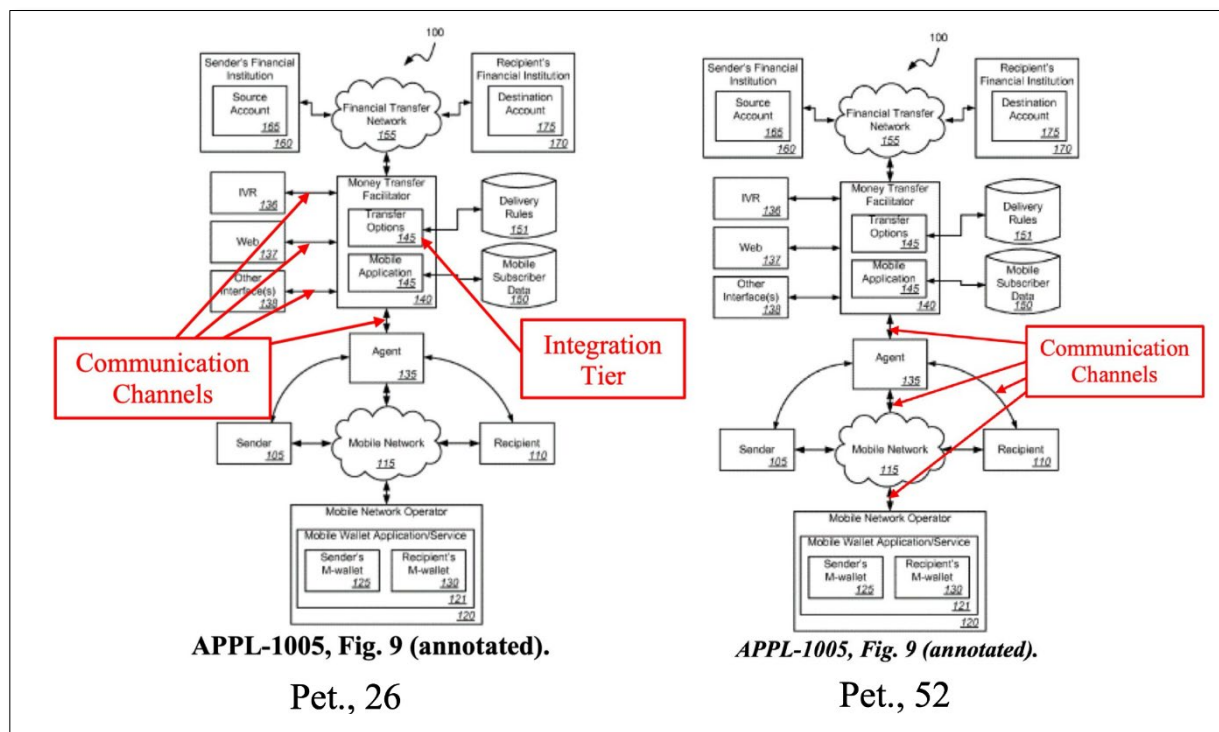
'488 Limitation 1.10A

the computing system receiving communication from an agent terminal over one of a plurality of communication channels connected to the cloud-based transaction platform, the agent communication indicating

'196 Limitation 1.12A

receive communication from the agent terminal over at least one of the plurality of channels connected to the computing system, the agent terminal communication

Dill's transfer options module 145 receives communication from the agent terminal 135 over many different communication channels.



Inter Partes Reviews

U.S. Patent No. 9,208,488

U.S. Patent No. 10,438,196

Apple Inc. v. Fintiv, Inc., Cases IPR2023-00398 & IPR2023-00399

Jonathan Bowser,
Haynes Boone, LLP

