

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Paul Poniatowski

Patent Owner

v.

Apple Inc.

Petitioner

Inter Partes Review Case No. IPR2024-00731

U.S. Patent No. 8,270,578

PATENT OWNER REPLY TO THE PETITIONER

Dear Sirs, responding to Petitioner's letter from 6 April 2025, I would like to assert that neither Wang, Dua or Yong is qualified as prior art :

Wang's invention does NOT teach of a straight connection between PEAD and POS as erroneously presented by the counsel; Before that can occur an approval transaction request must be send first from a separate requesting device 202 via its communication port 204 [0037]; only after receiving the approval token, client may proceed further.

Wherein my pat. 578 has capability to INSTANTLY initiate, carry-on and dispense a payment for commercial transaction; buy/pay - all in one action/function.

Dua discloses a button with function of a wallet. Wallet does not perform the function of initiating a transaction but rather a final stage - payment. My pat. 578 has capability to initiate a commercial transaction and dispense a payment - buy/pay - all in one action/function.

Yong 's device does not disclose a dedicated actuator for initialling commercial transactions or engage in commercial transaction as in pat. 578.

It is merely a commodity code inputing terminal - from the *Abstract* : conveying the information of goods from POS to the consumers mobile device for further consideration; a price checking device.

Therefore NONE of the alleged cited prior art by the counsel is in the same field of endeavour or is analogue to the pat. 578 and/or can qualify to be used as a “teaching in combination” tool.

Therefore the case/claims of the Petitioner’s counsel have no merit, can not be cited against my patent and should be dismissed.

/s/ Paul Poniatowski

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