

Exhibit 432-C
Subject Matter Eligibility Contentions for 10,674,432

Asserted claims 1-19 of U.S. Patent No. 10,219,432 (“the ’432 patent”) are patent-ineligible under 35 U.S.C. § 101. They are directed to an abstract idea, namely, the abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically performing a financial transaction after determining an entity to the transaction is present and is authorized to perform the transaction. *Alice Corp. v. CLS Bank Int’l*, 573 U.S. 208, 218-24 (2014).

Samsung contends that claim 1 of the ’432 patent is representative of the other asserted claims of the ’432 patent. Every independent claim of the ’432 patent is directed to the same abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically performing a financial transaction after determining an entity to the transaction is present and is authorized to perform the transaction, and recites substantially the same generic, conventional steps and elements for doing so. The only disclosure of any hardware in the claims are references to the same generic “smartphone,” and the steps performed by that hardware consist of the same generic data “detecting,” “receiving,” determining, and “providing” steps and the claimed controlling (including “in response to...”) that are part of the abstract idea at issue. The remaining elements of the independent and dependent claims do not add anything beyond abstract ideas, generic implementation details, or insignificant pre- or post-solution activity relative to claim 1 of the ’432 patent, such as further describing the generic wireless communications technology used to implement the claims, specifying the content of the data being received or transmitted, and requiring steps to be performed a second time.

Alternatively, Samsung contends that claim 1 of the ’411 patent is representative of all asserted claims of the Asserted Patents, including the ’432 patent. Claim 1 of the ’411 patent, like the claims of the ’432 patent, is directed to controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically transmitting information after determining an entity is present. First, as discussed above, claim 1 of the ’432 patent is representative of the other asserted claims of the ’432 patent. Second, claim 1 of the ’432 patent does not add anything beyond more abstract ideas, generic implementation details, or insignificant pre- or post-solution activity relative to claim 1 of the ’411 patent. For example, claim 1 of the ’411 patent recites additional, trivial pre-solution step of requesting and receiving authorization and further specifies that the data is transmitted in order to perform a financial transaction, a generic implementation detail, trivial post-solution activity, and itself an abstract concept.

Alternatively, Samsung contends that claim 1 of the ’756 patent is representative of all asserted claims of the Asserted Patents, including the ’432 patent. Claim 1 of the ’756 patent, like the claims of the ’432 patent, is directed to controlling whether to transmit data based on collecting and assessing information as criteria. First, as discussed above, claim 1 of the ’432 patent is representative of the other asserted claims of the ’432 patent. Second, claim 1 of the ’432 patent does not add anything beyond more abstract ideas, generic implementation details, or insignificant pre- or post-solution activity relative to claim 1 of the ’756 patent. For example, claim 1 of the ’432 patent recites additional, trivial aspects of the generic wireless communications technology used to implement the claims and includes three criteria (authorization, proximity, and biometrics) instead of one.

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Alternatively, Samsung contends that claim 1 of the '172 patent is representative of all asserted claims of the Asserted Patents, including the '432 patent. Claim 1 of the '172 patent, like the claims of the '432 patent, is directed to controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically transmitting information after determining an entity is present and passes a biometric check. First, as discussed above, claim 1 of the '432 patent is representative of the other asserted claims of the '432 patent. Second, claim 1 of the '432 patent does not add anything relative to claim 1 of the '712 patent. Indeed, claim 1 of the '712 patent includes additional generic implementation details, or insignificant pre- or post-solution activity not found in claim 1 of the '432 patent. Thus, if claim 1 of the '712 patent is found invalid, then claim 1 of the '432 patent is also invalid.

Nevertheless, Samsung has addressed each claim and element of the '432 patent in the charts below individually.

The disclosures throughout this chart are based on information presently available to Samsung and subject to amendment or supplementation. Furthermore, these disclosures are based on Samsung's current understanding of the asserted claims and Samsung's apparent view of the scope of those claims as shown, for example, in Telcom's Infringement Contentions. A *Markman* Order in this case has not yet been issued and in no way shall these Subject Matter Eligibility Contentions be taken as any admission or acquiescence by Samsung as to the proper scope of the asserted claims and/or proper claim constructions of terms and phrases recited in those claims. Further, Samsung's reliance on Telcom's contentions does not mean that Samsung in any way agrees with those contentions, or the constructions that they may imply. In addition, nothing in this ineligibility claim chart should be interpreted as a position about whether any portion of the asserted claim is limiting. Further, by submitting this Subject Matter Eligibility claim chart, Samsung does not waive and hereby expressly reserves its right to raise invalidity defenses including but not limited to defenses under 35 U.S.C. §§ 102, 103, and/or 112. Samsung reserves all rights to revise, amend, or supplement this Subject Matter Eligibility claim chart at a later date pursuant to subsections (c) and (d) of the Court's Standing Order Regarding Subject Matter Eligibility Contentions, including after the Court issues its claim construction ruling, if Telcom amends its Infringement Contentions, or to the extent the Court otherwise grants leave.

Claim	U.S. Patent No. 10,674,432	Section 101 Analysis
[1.1]	A method of operating a smartphone in performing a plurality of financial transactions, the method comprising:	<u>Alice Step One</u> As a preliminary matter, because the abstract idea inquiry at <i>Alice</i> Step One and the inventive concept inquiry at <i>Alice</i> Step Two often overlap—particularly concerning the existence of a specific technological improvement, any applicable legal or factual analysis provided in the step 2 section below is herein incorporated into the step 1 section, and vice versa. <i>See e.g. Ancora Techs. v. HTC Am., Inc.</i> , 908 F.3d 1343, 1349

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		(Fed. Cir. 2018); <i>Elec. Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353 (Fed. Cir. 2016). Considered as a whole, the asserted claims of the '432 patent, including claim 1, are directed to the abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically performing a financial transaction after determining an entity to the transaction is present and is authorized to perform the transaction. <i>Internet Patents Corp. v. Active Network, Inc.</i>, 790 F.3d 1343, 1346 (Fed. Cir. 2015) (“Under step one of Mayo/Alice, the claims are considered in their entirety to ascertain whether their character as a whole is directed to excluded subject matter.”); <i>Genetic Techs.</i>, 818 F.3d at 1375-76 (inquiry at Step 1 looks at “the focus of the claimed advance over the prior art.”) <i>See also e.g. Univ. of Fla. Research Found., Inc. v. GE Co.</i>, 916 F.3d 1363, 1368 (Fed. Cir. 2019) (confirming that “collecting, analyzing, manipulating, and displaying data” is an abstract idea); <i>Perfect Web Techs., Inc. v. Infousa, Inc.</i>, No. 07-80286- CIV, 2008 WL 6153736, at *10 (S.D. Fla. Oct. 27, 2008) (“[T]he Federal Circuit has held that a process that combines algorithms is no more patentable than any of the algorithms standing alone.”) <i>In re TLI Communications LLC</i>, 828 F.3d 607, 612 (Fed. Cir. 2016); <i>Zkey Inv., LLC v. Facebook Inc.</i>, 2016 WL 7046593, at *5 (C.D. Cal. Dec. 2, 2016); <i>Modern Telecom Systems LLC v. Lenovo (United States) Inc.</i>, 2015 WL 7776873, at *9 (C.D. Cal. Dec. 2, 2015) (Carter, J.) (claims directed to “communicating data and mathematical calculations through communications channels . . . are directed to abstract ideas”). The focus of the asserted claims of the '432 patent is on the abstract idea is confirmed by the claim language itself as well as at least the following disclosures in the patent abstract, specification, and claims, and/or admissions by Telcom: • “Mobile device mode enablement responsive to a proximity criterion” ('432 patent at Title) • “A system (10) and method (30) comprises a detector that is configured to enable a mode of a first device (14) and/or to enable a mode of a second device (15) responsive to a detection that a proximity criterion is satisfied between the first device and an entity (Entity 1) and responsive to at least one
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		of a position, velocity and a Time-of-Day and where the second device is not the entity and is not associated with the entity, and where the entity is not involved in providing a communications service to the first and/or second device.” (’432 patent at Abstract) • “This invention relates to systems, devices and/or methods that may be used to provide an adaptive enablement of one or more communications modes based upon having satisfied a proximity criterion.” (’432 patent at 1:30-33) • “The present invention, addresses these limitations (i.e., the rigidity) of current wireless mobile devices. Accordingly, embodiments of the present invention provide systems, devices and/or methods that may be used to enable adaptively one or more modes/functions of a device based upon having satisfied by the device (or another device) a proximity condition/criterion.” (’432 patent at 1:53-59) • “As used herein, the term ‘end-user device,’ ‘wireless mobile device,’ ‘mobile wireless device’ or simply ‘device’ includes any electronic device that may be used to transmit/receive information wirelessly and/or non-wirelessly such as, for example, a Digital Subscriber Line (DSL) modem/transceiver; a cable modem/transceiver; a cellular and/or satellite radiotelephone with or without a multi-line display; Personal Communications System (PCS) terminals that may combine a radiotelephone with data processing, facsimile and/or data communications capabilities; Personal Digital Assistants (PDA) that can include a radio frequency transceiver and/or a pager, Internet/Intranet access, Web browser, organizer, calendar and/or a global positioning system (GPS) receiver; laptop and/or palmtop computers or other appliances, which may (or may not) include a radio frequency transceiver.” (’432 patent at 1:60-2:8) • “This invention may, however, be embodied in many different forms and should not be construed as limited to the embodiments set forth herein. Rather, these embodiments are provided so that this disclosure will be thorough and complete, and will fully convey the scope of the invention to those skilled in the art.” (’432 patent at 2:38-43) • “The terminology used herein is for the purpose of describing particular embodiments only and is not intended to be limiting of the invention.” (’432
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		patent at 2:50-53) • “Unless otherwise defined, all terms (including technical and scientific terms) used herein have the same meaning as commonly understood by one of ordinary skill in the art to which this invention belongs. It will be further understood that terms, such as those defined in commonly used dictionaries, should be interpreted as having a meaning that is consistent with their meaning in the context of the relevant art and the present disclosure, and will not be interpreted in an idealized or overly formal sense unless expressly so defined herein.” (’432 patent at 2:62-3:4) • “A mobile device such as, for example, a wireless communications device (e.g., a wireless terminal, a wireless/mobile phone, a Personal Digital Assistant (PDA), a smart phone, a multi-media device including Global Positioning System (GPS) capability, etc.) and/or one or more systems that is/are providing service to the mobile device and/or to a device other than the mobile device, may be configured to enable one or more modes/functions of the mobile device and/or of the device other than the mobile device, responsive to a proximity criterion having been satisfied.” (’432 patent at 3:17-26) • “A wireless communications device may be configured to estimate a location associated therewith and may also be configured to estimate a value of at least one other parameter that may be associated with the wireless communications device, an environment thereof and/or an entity (living or otherwise) that is associated with and/or is proximate to the wireless communications device. The ‘at least one other parameter’ may, for example, be a velocity, acceleration, ToD, ToM, ToY, humidity, temperature, height, level of brightness, level of darkness, a blood pressure, a heart rate, a blood content, a physiological state, a psychological state, etc. As those skilled in the art will appreciate, the wireless communications device may be configured to estimate its location and the value of the ‘at least one other parameter’ by, for example, processing GPS signals and/or by using other means and/or sensors that may, according to some embodiments, be device-based and/or network assisted/based means and/or sensors.” (’432 patent at 6:17-34) • “In some embodiments, the first communications mode may comprise an air
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		interface protocol, such as, for example, an Orthogonal Frequency Division Multiplexed and/or an Orthogonal Frequency Division Multiple Access (OFDM/OFDMA) protocol, a WiFi- and/or WiMAX-based air interface protocol that may be based upon Time Division Duplex (TDD) operation wherein a common set of frequencies are used bi-directionally (at different times) to provide uplink and downlink communications, and the first and/or second set of frequencies may comprise, for example, an un-licensed use and/or a licensed use set of frequencies.” (’432 patent at 7:21-31) • “In the specification, there have been disclosed embodiments and, although specific terms are employed, they are used in a generic and descriptive sense only and not for purposes of limitation.” (’432 patent at 13:6-9) The claims are thus akin to claims that other courts have found to be abstract. <i>See Amdocs (Israel) Ltd. v. Openet Telecom, Inc.</i>, 841 F.3d 1288, 1294 (Fed. Cir. 2016) (acknowledging that “the decisional mechanism courts now apply is to examine earlier cases in which a similar or parallel descriptive nature can be seen”). For example: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir.
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		2023) Indeed, the claims are directed to the same steps used in long-prevalent practices for engaging in a financial transaction that apply even outside the context of any computer implementation. <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307, 1314 (Fed. Cir. 2016). For example, to engage in a significant financial transaction, such as buying a house, the buyer has to (1) present proof the buyer is able to afford or otherwise authorized to engage in the purchase, such as by being pre-approved by a bank; (2) attend the contract signing in person; and (3) show a driver’s license or other form of photo identification to allow the notary to biometrically verify the identity of the buyer. Only after all three criteria are met, is the buyer able to consummate the financial transaction – an economic process and thus an abstract idea. <i>Alice</i>, 573 U.S. at 219-220; <i>see also Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021); <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020); <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017). As another example, to make purchases using a credit card, an individual must first submit a signed credit card application, and after authorization and receiving the credit card, must present the credit card in person at the store and further show a driver’s license or other form of photo identification before being allowed to complete a purchase. The fact that the asserted claims automate this process by controlling computer functionality does not confer patent eligibility. <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019). As shown by the cases identified above, the Federal Circuit has repeatedly found that applying abstract ideas to control computer functionality does not make the claims any less abstract. The fact that the software in the claims of the ’432 patent is implemented on a “smartphone” has no bearing on the <i>Alice</i> analysis because limiting the claims to a particular technological environment does not render them any less abstract. <i>Alice</i>, 573 U.S. at 226; <i>Repifi Vendor Logistics, Inc. v. IntelliCentrics, Inc.</i>, Appeal No. 2021-1906, 2022 WL 794971 (Fed. Cir, Mar. 15 2022). Indeed, the ’432 patent contends that its disclosure is applicable to numerous consumer electronic device. <i>See</i> ’432 patent at 1:60-2:8 (“As used herein, the term ‘end-user device,’ ‘wireless
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	mobile device,’ ‘mobile wireless device’ or simply ‘device’ includes any electronic device that may be used to transmit/receive information wirelessly and/or non-wirelessly such as, for example, a Digital Subscriber Line (DSL) modem/transceiver; a cable modem/transceiver; a cellular and/or satellite radiotelephone with or without a multi-line display; Personal Communications System (PCS) terminals that may combine a radiotelephone with data processing, facsimile and/or data communications capabilities; Personal Digital Assistants (PDA) that can include a radio frequency transceiver and/or a pager, Internet/Intranet access, Web browser, organizer, calendar and/or a global positioning system (GPS) receiver; laptop and/or palmtop computers or other appliances, which may (or may not) include a radio frequency transceiver.”). Moreover, whether the claimed control occurs in response to one or multiple criteria being met does not change the abstract nature of the claims. <i>RecogniCorp, LLC v. Nintendo Co., Ltd.</i>, 855 F.3d 1322, 1327 (Fed. Cir. 2017). In addition, neither the claims nor the specification discloses any specific technological problem to be solved by the alleged invention, or a particular technological solution for solving any such problem. Instead, the patent is clear that the alleged invention is a business or design choice implemented using existing technological advancements. For example, all “Example[s]/Application[s]” in the specification describe usage scenarios from a consumer’s perspective (e.g., “Mr. Jones”) and how those usage scenarios allegedly improve the consumer experience without identifying any technological problems or solutions. <i>See</i> ’432 patent at 4:39-8:65. The ’432 patent admits that any technical terms used in describing those “Example[s]/Application[s]” are “commonly understood” and “generic.” ’432 patent at 2:38-43, 13:6-9. There is no disclosure in the ’432 patent specification, not to mention in the claims, of any improvement to a computer’s ability to perform any of the claimed steps (individually or a whole), including no disclosure of improved proximity sensing, improved determination if other parameters (e.g., biometrics) are met, improved authentication or authorization processes, or any new or improved wireless communication technology.
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	Moreover, the entire disclosure in the specification and the corresponding claim elements are described at a high level of abstraction, with reference to generic, conventional hardware and routine software functions; or using only results-based functional language, without limiting the alleged invention or the claims to any particular technological solution. <i>See Affinity Labs of Texas, LLC v. Amazon.com Inc.</i>, 838 F.3d 1266, 1269 (Fed. Cir. 2016) (“The purely functional nature of the claim[s] confirm[] that [they are] directed to an abstract idea, not to a concrete embodiment of that idea.”). Finally, the ’432 patent claims an effective filing date of November 4, 2008. At that time, systems and methods implementing the abstract ideas described in the ’432 patent were conventional. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that existed years before the alleged invention of the ’432 patent. <u>Alice Step Two</u> The asserted claims also lack any additional features that constitute an inventive concept transforming them into a patent-eligible invention. <i>See Alice</i>, 573 U.S. at 221. As a preliminary matter, because the abstract idea inquiry at <i>Alice</i> Step One and the inventive concept inquiry at <i>Alice</i> Step Two often overlap—particularly concerning the existence of a specific technological improvement, any applicable legal or factual analysis provided in the step 1 section above is herein incorporated into the step 2 section, and vice versa. <i>See e.g. Ancora Techs. v. HTC Am., Inc.</i>, 908 F.3d 1343, 1349 (Fed. Cir. 2018); <i>Elec. Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353 (Fed. Cir. 2016). Turning first to the claim as a whole, the ordered combination of claim elements does not constitute a technical improvement over the prior art or otherwise reflect any inventive concept. Rather, the claims are directed to “generalized steps to be performed on a computer using conventional computer activity.” <i>See Two-Way</i>
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		<i>Media Ltd. v. Comcast Cable Commc'ns., LLC</i>, 874 F.3d 1329, 1337 (Fed. Cir. 2017). It is not directed to a specific implementation that improves a particular computer functionality (i.e., the way computers operate). <i>Finjan, Inc. v. Blue Coat Sys.</i>, 879 F.3d 1299, 1303 (Fed. Cir. 2018) (“In cases involving software innovations, [the abstract idea] inquiry often turns on whether the claims focus on “the specific asserted improvement in computer capabilities.” (citing <i>Enfish, LLC v. Microsoft Corp.</i>, 822 F.3d 1327, 1335-36 (Fed. Cir. 2016))). Nor is it directed to “an improvement in computer functionality [described with] the specificity required to . . . claim[] a way of achieving it.” <i>Ancora Techs. v. HTC Am., Inc.</i>, 908 F.3d 1343, 1349 (Fed. Cir. 2018). Tellingly, the specification describes the claimed invention solely using references to “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of any technological improvement over the prior arts; rather, the ’432 patent merely refers to broad aspects of existing technology that can be used to implement the abstract ideas at issue. <i>See, e.g.</i>, 1:60-2:8, 3:17-26, 6:17-34, 7:21-31. And the abstract idea implemented using such conventional computer activity cannot itself supply an inventive concept. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018). Indeed, the ’432 patent claims an effective filing date of November 4, 2008. At that time, systems and methods implementing the abstract ideas described in the ’432 patent were well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that existed years before the alleged invention of the ’432 patent. The ’432 patent claims are thus comparable to other claims where the Federal Circuit found no inventive concept. <i>See Amdocs</i>, 841 F.3d at 1294) (acknowledging that “the decisional mechanism courts now apply is to examine earlier cases in which a similar or parallel descriptive nature can be seen”). • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)
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	• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) Further, the claims merely use results-oriented, functional language, without describing how to accomplish any function, and thus lack an inventive step that can render the claims patent eligible. <i>See, e.g., Affinity Labs of Texas, LLC v. Amazon.com Inc.</i>, 838 F.3d 1266, 1269 (Fed. Cir. 2016) (“The purely functional nature of the claim[s] confirm[] that [they are] directed to an abstract idea, not to a concrete embodiment of that idea.”); <i>Int’l Business Machines v. Zillow Group</i>, 50 F.4th 1371, 1379-80 (Fed. Cir. 2022) (claims “written in ‘result-based functional language’ that ‘does not sufficiently describe how to achieve these results in a non-abstract way’” were patent ineligible); <i>Two-Way Media v. Comcast Cable Comm’ns</i>, 874 F.3d 1329, 1337 (Fed. Cir. 2017) (claims do not “sufficiently describe how to achieve these results in a non-abstract way”). The asserted claims are ineligible at least because they are so broad “as to preempt a fundamental concept or idea.” <i>See e.g. DealerTrack, Inc. v. Huber</i>, 674 F.3d 1315, 1331 (Fed. Cir. 2012); <i>Ariosa Diagnostics, Inc. v. Sequenom, Inc.</i>, 788 F.3d 1371, 1379 (Fed. Cir. 2015) (explaining that even partial preemption may signal patent ineligible subject matter). Monopolization of such abstract ideas improperly tie up building blocks of science thereby thwarting innovation—“the primary object of the patent laws.” <i>Alice</i>, 573 U.S. at 216.
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	Turning to this specific claim element, the claim element “[a] method of operating a smartphone in performing a plurality of financial transactions” (even if this preamble is found to be limiting) does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018). Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)
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		• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)
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		• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.2]	responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone, enabling a mode to communicate by the smartphone information requesting an authorization;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone, enabling a mode to communicate by the smartphone information requesting an authorization” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.

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		<i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
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		1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
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		• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.3]	while the mode is enabled, transmitting by the smartphone first data to a first device, the first data relating to a plurality of financial transactions to be conducted;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “while the mode is enabled, transmitting by the smartphone first data to a first device, the first data relating to a plurality of financial transactions to be conducted” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.

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		Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
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		• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
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		2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.4]	receiving by the smartphone second data from the first device responsive to said transmitting by the smartphone the first data, the second data relating to the plurality of financial transactions to be conducted and differing from the first data;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “receiving by the smartphone second data from the first device responsive to said transmitting by the smartphone the first data, the second data relating to the plurality of financial transactions to be conducted and differing from the first data” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:

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		• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.5]	performing a first transaction of the plurality of financial transactions by:	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i> , element [1.1]

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	Turning to the specific claim element, the claim element “performing a first transaction of the plurality of financial transactions” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)
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		• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)
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		• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.6]	detecting by the smartphone that a proximity condition is satisfied between the smartphone and a first entity, wherein the first entity is distinct from the first device;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “detecting by the smartphone that a proximity condition is satisfied between the smartphone and a first entity, wherein the first entity is distinct from the first device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.

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		<i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
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		1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
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		• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.7]	establishing, using a first air interface, a wireless short-range communications link between the smartphone and the first entity, in response to the proximity condition having been satisfied between the smartphone and the first entity;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “establishing, using a first air interface, a wireless short-range communications link between the smartphone and the first entity, in response to the proximity condition having been satisfied between the smartphone and the first entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.

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		Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
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		• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
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		2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.8]	receiving, using the first air interface, a short-range signal from the first entity; and	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “receiving, using the first air interface, a short-range signal from the first entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)

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		• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc.v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)
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		• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.9]	responsive to receiving the short-range signal from the first entity, sending by the smartphone to the first entity over the first air interface, information associated with the second data received from the first device; and	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “responsive to receiving the short-range signal from the first entity, sending by the smartphone to the first entity over the first air interface, information associated with the second data received from

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		the first device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)
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		• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)
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		• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.10]	independent of performing said first transaction, receiving by the smartphone a communications service from a wireless network, using a second air interface that differs from the first air interface,	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “independent of performing said first transaction, receiving by the smartphone a communications service from a wireless network, using a second air interface that differs from the first air interface” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].

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	Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F.
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		App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>,
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		958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.11]	wherein said transmitting by the smartphone first data and said receiving by the smartphone second data are performed over an air interface that differs from the first air interface.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein said transmitting by the smartphone first data and said receiving by the smartphone second data are performed over an air interface that differs from the first air interface” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology.

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	<i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)
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		• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir.
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		2016).
[2.1]	The method of claim 1, wherein establishing the wireless short-range communications link between the smartphone and the first entity is performed responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone.	<i>See supra</i>, [1.1-1.11]. For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein establishing the wireless short-range communications link between the smartphone and the first entity is performed responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent.

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		Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)
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		• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[3.1]	The method of claim 1, wherein sending by the smartphone to the	<i>See supra</i> , [1.1-1.11].

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first entity, information associated with the second data, is performed responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein sending by the smartphone to the first entity, information associated with the second data, is performed responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)
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		• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)
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		• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[4.1]	The method of claim 1, wherein sending by the smartphone to the first entity, information associated with the second data, is performed responsive to a value of at least one parameter associated with the smartphone.	<i>See supra</i>, [1.1-1.11]. For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]

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	Turning to the specific claim element, the claim element “wherein sending by the smartphone to the first entity, information associated with the second data, is performed responsive to a value of at least one parameter associated with the smartphone” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)
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		• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)
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		• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[5.1]	The method of claim 1, wherein the method further comprises:	<i>See supra</i> , [1.1-1.11].
[5.2]	performing a second transaction of the plurality of financial transactions by:	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “performing a second transaction of the plurality of financial transactions” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.

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	First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)
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	• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)
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		• <i>Ultramercial, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[5.3]	detecting by the smartphone that a proximity condition is satisfied between the smartphone and a second entity, wherein the second entity is distinct from the first entity and is further distinct from the first device;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “detecting by the smartphone that a proximity condition is satisfied between the smartphone and a second entity, wherein the second entity is distinct from the first entity and is further distinct from the first device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical

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		concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung's invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
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		2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020)
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		• <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[5.4]	establishing, using the first air interface, a wireless short-range communications link between the smartphone and the second entity, in response to the proximity condition having been satisfied between the smartphone and the second entity;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “establishing, using the first air interface, a wireless short-range communications link between the smartphone and the second entity, in response to the proximity condition having been satisfied between the smartphone and the second entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which

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		provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364
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		(Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
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[5.5]	receiving, using the first air interface, a short-range signal from the second entity; and	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “receiving, using the first air interface, a short-range signal from the second entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)
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		• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir.
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		2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[5.6]	responsive to receiving the short-range signal from the second entity, sending by the smartphone to the second entity over the first air interface, information associated with the second data received from the first device.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “responsive to receiving the short-range signal from the second entity, sending by the smartphone to the second entity over the first air interface, information associated with the second data received from the first device” does not add anything significant to the abstract idea at issue,

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	consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345
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		(Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x
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		848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[6.1]	The method of claim 1,	<i>See supra</i> , [1.1-1.11].
[6.2]	wherein said transmitting by the smartphone first data to a first device includes transmitting by the smartphone data relating to a request to pay for a transaction; and	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein said transmitting by the smartphone first data to a first device includes transmitting by the smartphone data relating to a request to pay for a transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.

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		<i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
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		1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
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		• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[6.3]	wherein said receiving by the smartphone second data from the first device includes receiving by the smartphone data relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a transaction.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein said receiving by the smartphone second data from the first device includes receiving by the smartphone data relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.

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		Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024
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		WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017)
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		• <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[7.1]	The method of claim 1, comprising:	<i>See supra</i> , [1.1-1.11].
[7.2]	transmitting by the smartphone third data to a second device; the second device being distinct from the first device and further being distinct from the first entity; and	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “transmitting by the smartphone third data to a second device; the second device being distinct from the first device and further being distinct from the first entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent.

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		Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)
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		• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
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[7.3]	receiving by the smartphone fourth data from the second device relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a financial transaction,	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “receiving by the smartphone fourth data from the second device relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)
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		• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir.
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		2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[7.4]	wherein said transmitting by the smartphone third data to a second device and said receiving by the smartphone fourth data from the second device are performed over the air interface that differs from the first air interface.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein said transmitting by the smartphone third data to a second device and said receiving by the smartphone fourth data from the second device are performed over the air interface that differs from the first air interface” does not add anything significant to the abstract idea at

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	issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345
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		(Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x
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		848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[8.1]	The method of claim 1, wherein said operations further comprise:	<i>See supra</i> , [1.1-1.11].
[8.2]	responsive to performing a financial transaction, causing data to be transmitted selectively to a plurality of predetermined devices and further causing data to be received selectively from said plurality of predetermined devices.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “responsive to performing a financial transaction, causing data to be transmitted selectively to a plurality of predetermined devices and further causing data to be received selectively from said plurality of predetermined devices” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the '432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.

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		<i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1]. Second, the '432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element. Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
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		1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
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		• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[9.1]	The method of claim 1, wherein the second air interface comprises an Orthogonal Frequency Division Multiplexed and/or an Orthogonal Frequency Division Multiple Access (OFDM/OFDMA) technology.	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1] Turning to the specific claim element, the claim element “wherein the second air interface comprises an Orthogonal Frequency Division Multiplexed and/or an Orthogonal Frequency Division Multiple Access (OFDM/OFDMA) technology” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two. First, this claim element is merely part of the abstract idea embodied in the ’432 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1]. Second, the ’432 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’432 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.

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		Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 432-A01 to 432-A23, and Exhibit 432-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’432 patent. Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility: • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
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		• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
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		2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[10.1]	A smartphone that is configured to perform operations associated with a plurality of financial transactions; the operations comprising:	<i>See supra</i> , [1.1]. In addition, whether a claim is facially directed to a method (such as claim 1) or a system (such as claim 10) is irrelevant to determining patent eligibility. <i>See Alice</i> , 573 U.S. at 226-27.
[10.2]	responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone, enabling a mode to communicate by the smartphone information requesting an authorization;	<i>See supra</i> , [1.2].
[10.3]	while the mode is enabled, transmitting first data to a first device as a precursor to performing the plurality of financial transactions; and	<i>See supra</i> , [1.3].
[10.4]	receiving second data from the first device responsive to said transmitting the first data;	<i>See supra</i> , [1.4].
[10.5]	performing a first financial transaction of the plurality of financial transactions by:	<i>See supra</i> , [1.5].
[10.6]	detecting by the smartphone that a proximity condition is satisfied between the smartphone and a first entity, wherein the first entity is distinct from the first device;	<i>See supra</i> , [1.6].

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[10.7]	establishing, using a first air interface, a wireless short-range communications link between the smartphone and the first entity, in response to the proximity condition having been satisfied between the smartphone and the first entity;	<i>See supra</i> , [1.7].
[10.8]	receiving, using the first air interface, a short-range signal from the first entity; and	<i>See supra</i> , [1.8].
[10.9]	responsive to receiving the short-range signal from the first entity, sending to the first entity over the first air interface, information based on the second data received from the first device; and	<i>See supra</i> , [1.9].
[10.10]	independent of performing a transaction to pay for one or more items, receiving by the smartphone a communications service from a wireless network, using a second air interface that differs from the first air interface,	<i>See supra</i> , [1.10].
[10.11]	wherein said transmitting first data and said receiving second data are performed over an air interface that differs from the first air interface.	<i>See supra</i> , [1.11].
[11.1]	The smartphone of claim 10, wherein establishing the wireless short-range communications link between the smartphone and the first entity is performed responsive to at least one physiological	<i>See supra</i> , [2.1, 10.1-10.11].

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	parameter having been sensed by at least one sensor of the smartphone.	
[12.1]	The smartphone of claim 10, wherein sending by the smartphone to the first entity, information based on the second data, is performed responsive to at least one physiological parameter having been sensed by at least one sensor of the smartphone.	<i>See supra</i> , [3.1, 10.1-10.11].
[13.1]	The smartphone of claim 10, wherein sending by the smartphone to the first entity, information based on the second data, is performed responsive to a value of at least one parameter associated with the smartphone.	<i>See supra</i> , [4.1, 10.1-10.11].
[14.1]	The smartphone of claim 10, wherein the operations further comprise:	<i>See supra</i> , [10.1-10.11].
[14.2]	performing a second financial transaction of the plurality of financial transactions by:	<i>See supra</i> , [5.2].
[14.3]	detecting by the smartphone that a proximity condition is satisfied between the smartphone and a second entity; wherein the second entity is distinct from the first entity and is further distinct from the first device;	<i>See supra</i> , [5.3].
[14.4]	establishing, using the first air interface, a wireless short-range communications link between the	<i>See supra</i> , [5.4].

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	smartphone and the second entity, in response to the proximity condition having been satisfied between the smartphone and the second entity;	
[14.5]	receiving, using the first air interface, a short-range signal from the second entity; and	<i>See supra</i> , [5.5].
[14.6]	responsive to receiving the short-range signal from the second entity, sending by the smartphone to the second entity over the first air interface; information associated with the second data received from the first device.	<i>See supra</i> , [5.6].
[15.1]	The smartphone of claim 10,	<i>See supra</i> , [10.1-10.11].
[15.2]	wherein said transmitting by the smartphone first data to a first device includes transmitting by the smartphone data relating to a request to pay for a transaction; and	<i>See supra</i> , [6.2].
[15.3]	wherein said receiving by the smartphone second data from the first device includes receiving by the smartphone data relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a transaction.	<i>See supra</i> , [6.3].
[16.1]	The smartphone of claim 10, wherein said operations further comprise:	<i>See supra</i> , [10.1-10.11].

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[16.2]	transmitting third data to a second device; the second device being distinct from the first device and further being distinct from the first entity; and	<i>See supra</i> , [7.2].
[16.3]	receiving by the smartphone fourth data from the second device relating to an acknowledgement and/or authorization of enabling a mode/function to pay for a financial transaction;	<i>See supra</i> , [7.3].
[16.4]	wherein said transmitting by the smartphone third data to a second device and said receiving by the smartphone fourth data from the second device are performed over the air interface that differs from the first air interface.	<i>See supra</i> , [7.4].
[17.1]	The smartphone of claim 10, wherein said operations further comprise:	<i>See supra</i> , [10.1-10.11].
[17.2]	responsive to performing a financial transaction, causing data to be transmitted selectively to a plurality of predetermined devices and further causing data to be received selectively from said plurality of predetermined devices.	<i>See supra</i> , [8.2].