

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

WIPO Patent Application Publication No. 2006/087503 (“Waters”) was filed on February 15, 2005, published on August 24, 2006, and therefore qualifies as prior art under at least 35 U.S.C. § 102 as to the asserted claims of U.S. Pat. No. 11,924,743 (“the ’743 Patent”). Waters, including any material incorporated by reference into Waters, anticipates claims 1-14 (“the Asserted Claims”) of the ’743 Patent under 35 U.S.C. § 102. Waters also renders obvious the Asserted Claims under 35 U.S.C. § 103, alone based on the state of the art and/or in combination with one or more references identified in Samsung’s accompanying disclosure for the ’743 Patent.¹

To the extent Plaintiff alleges that the Waters does not disclose any particular limitation of the Asserted Claims of the ’743 Patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the ’743 Patent to modify the Waters reference and/or to combine the teachings of the Waters reference with other prior art references, including but not limited to the present prior art references found in Exhibit 743-B and the corresponding section(s) of charts for other prior art references for the ’743 Patent in a manner that would have rendered the Asserted Claims invalid as obvious.

With respect to the obviousness of the Asserted Claims under 35 U.S.C. § 103, one or more of the principles enumerated by the United States Supreme Court in *KSR v. Teleflex*, 550 U.S. 398 (2007) apply, including: (a) combining various claimed elements known in the prior art according to known methods to yield a predictable result; and/or (b) making a simple substitution of one or more known elements for another to obtain a predictable result; and/or (c) using a known technique to improve a similar device or method in the same way; and/or (d) applying a known technique to a known device or method ready for improvement to yield a predictable result; and/or (e) choosing from a finite number of identified, predictable solutions with a reasonable expectation of success or, in other words, the solution was one which was “obvious to try”; and/or (f) a known work in one field of endeavor prompting variations of it for use either in the same field or a different field based on given design incentives or other market forces in which the variations were predictable to one of ordinary skill in the art; and/or (g) a teaching, suggestion, or motivation in the prior art that would have led one of ordinary skill in the art to modify the prior art reference or to combine the teachings of various prior art references to arrive at the claimed invention. It therefore would have been obvious to one of ordinary skill in the art to combine the disclosures of these references in accordance with the principles and rationales set forth above.

The citations to portions of any reference in this chart are exemplary only. For example, a citation that refers to or discusses a figure or figure item should be understood to also incorporate by reference that figure and any additional descriptions of that figure as if set

¹ Samsung notes that Plaintiff appears in many instances to be pursuing overly broad constructions of various limitations of the asserted claims of the ’743 Patent in an effort to piece together an infringement claim where none exists and to accuse a product that does not practice the claims. This claim chart may take into account Plaintiff’s overly broad constructions of the claim limitations. Any assertion that a particular limitation is disclosed by a prior art reference may be based on Plaintiff’s apparent constructions and is not intended to be, and is not, an admission that such constructions are supportable or proper.

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

forth fully therein. Samsung reserves the right to rely on the entirety of the references cited in this chart to show that the Asserted Claims are invalid. Citations presented for one claim limitation are expressly incorporated by reference into all other limitations for that claim as well as all limitations of all claims on which that claim depends. Samsung also reserves the right to rely on additional citations or sources of evidence that also may be applicable, or that may become applicable in light of claim construction, changes in Plaintiff's infringement contentions, and/or information obtained during discovery as the case progresses.

Claim	U.S. Patent No. 11,924,743	Exemplary Disclosure in Waters
[1.1]	A method of establishing a capability at a smartphone to conduct a financial transaction; the method comprising:	To the extent the preamble is limiting, Waters discloses "a method of establishing a capability at a smartphone to conduct a financial transaction; the method comprising:" See e.g.:

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

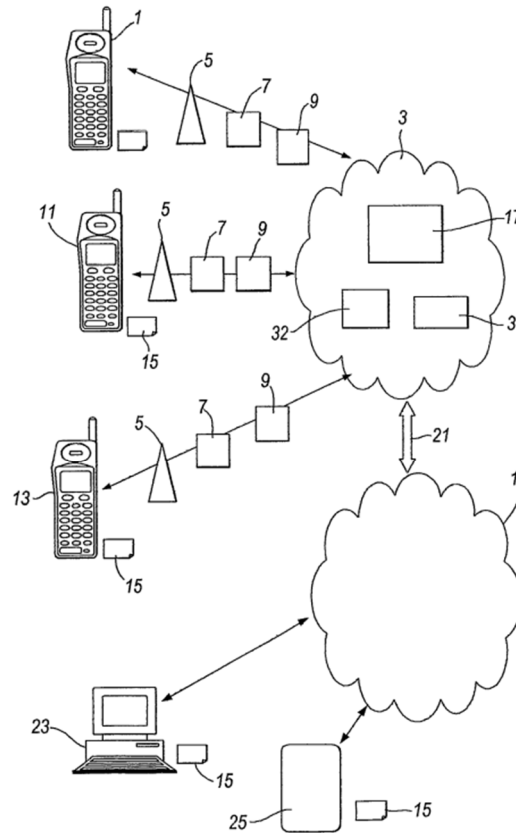


Fig.1

Waters at Figure 01

A mobile terminal is disclosed which includes a near field or RFID tag (41). The mobile terminal (1) communicates with the mobile telecommunications network and is authenticated with that network using the SIM (15). The mobile terminal (1) is operable to obtain security data from the user thereof, such as a PIN or biometric data, or the mobile terminal (1) incorporates a sensor such as a light

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		sensor, pressure sensor, heat sensor, skin resistant sensor or inertial sensor. The input device or sensor is used to confirm the identity of the user or to evaluate whether the user wishes to use the near field tag (41) to make a payment or obtain entry to a building (for example). Data from the sensor is passed to the SIM (15), which issues a command enabling the near field tag (41), via link (43). The near field tag (41) may then be read by a reader. The near field tag (41) may be automatically disabled after being read by the reader, after a predetermined time, or when the stimulus to the sensor is no longer present. Waters at Abstract Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[1.2]	responsive to sensing a value of a parameter and responsive to determining that the value of the parameter sensed satisfies a criterion, selectively establishing a master-slave relationship, and selectively requesting an authorization to establish said capability; then	Waters discloses “responsive to sensing a value of a parameter and responsive to determining that the value of the parameter sensed satisfies a criterion, selectively establishing a master-slave relationship, and selectively requesting an authorization to establish said capability; then” See e.g.: The invalidity chart for the ’793 patent in view of Waters at 1.2-1.5. According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible).

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO-IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into
--	--	--

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID). Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[1.3]	receiving the authorization to establish the capability, responsive to said selectively requesting an authorization, and establishing the capability at the smartphone responsive to said receiving the authorization;	Waters discloses “receiving the authorization to establish the capability, responsive to said selectively requesting an authorization, and establishing the capability at the smartphone responsive to said receiving the authorization;” See e.g.: The invalidity chart for the '793 patent in view of Waters at 1.6-1.7. The near field tag 41 may be selectively enabled and disabled in order to reduce the opportunity to obtain information from the near field tag 41 by an unauthorised reader. The following arrangements are useful if the near field tag 41 is to be enabled and disabled for fairly long periods of time: Waters at Page 14 of 38 (1) Personal identification number (PESf) entry - the keypad 37 of the mobile terminal 1 is used to enter a PIN (or other secret password) to enable the near field tag 41. The user's PIN may be stored in a secure location in the mobile terminal 1 or in the SIM 15. When the user enters their PIN using the keypad 37, the entered PIN is compared with the stored PIN. If the PINs match, the SIM

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	transmits a message, via link 43, to the near field tag 41 to activate the near field tag. (2) Biometric data entry - the mobile terminal 1 may incorporate a fingerprint reader 45. The fingerprint reader 45 scans the fingerprint of the user when the user's finger is placed on the reader 45 and compares it to the user's fingerprint stored in the memory of the mobile terminal 1 or the SIM 15. If the fingerprints are determined to match, the message is sent from the SIM 15, via link 43, to the RF tag 41. As an alternative to a fingerprint, other biometric data could be used - for example, voice recognition (using the mobile terminal's built-in microphone and a voice recognition algorithm within the mobile terminal 1 or SIM card 15) or retinal scanning (using the mobile terminal's built-in camera). Waters at Page 15 of 38 Arrangements (1) and (2) above may advantageously be combined with an RF tag 41 that automatically deactivates after it has been read by a reader. That is, the user will activate the RF tag by entering their PIN or biometric data prior to bringing the mobile terminal 1 into proximity to the reader. After successful reading of the RF tag 41, the RF tag automatically disables itself so that no further reading can occur without the PIN or biometric data being re-entered. If the mobile terminal 1 is lost or stolen, an unauthorised person cannot use the RF tag 41. Arrangements (1) and (2) above are fairly inconvenient if a user wishes to activate their RF tag 41 fairly frequently. The following arrangements may be more convenient when relatively frequent activation of the RF tag 41 is required: Waters at Page 15 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO-IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID).
--	---

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[1.4]	wherein said selectively establishing a master-slave relationship, said selectively requesting an authorization and said receiving the authorization comprises wirelessly transmitting/receiving using a WiFi air interface protocol, an Orthogonal Frequency Division Multiplexing air interface protocol and/or an Orthogonal Frequency Division Multiple Access air interface protocol; and	Waters discloses “wherein said selectively establishing a master-slave relationship, said selectively requesting an authorization and said receiving the authorization comprises wirelessly transmitting/receiving using a WiFi air interface protocol, an Orthogonal Frequency Division Multiplexing air interface protocol and/or an Orthogonal Frequency Division Multiple Access air interface protocol; and” See e.g.: The near field tag 41 may be selectively enabled and disabled in order to reduce the opportunity to obtain information from the near field tag 41 by an unauthorised reader. The following arrangements are useful if the near field tag 41 is to be enabled and disabled for fairly long periods of time: Waters at Page 14 of 38 (1) Personal identification number (PESf) entry - the keypad 37 of the mobile terminal 1 is used to enter a PIN (or other secret password) to enable the near field tag 41. The user's PIN may be stored in a secure location in the mobile terminal 1 or in the SIM 15. When the user enters their PIN using the keypad 37, the entered PIN is compared with the stored PIN. If the PINs match, the SIM transmits a message, via link 43, to the near field tag 41 to activate the near field tag. (2) Biometric data entry - the mobile terminal 1 may incorporate a fingerprint reader 45. The fingerprint reader 45 scans the fingerprint of the user when the user's finger is placed on the reader 45 and compares it to the user's fingerprint

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	stored in the memory of the mobile terminal 1 or the SIM 15. If the fingerprints are determined to match, the message is sent from the SIM 15, via link 43, to the RF tag 41. As an alternative to a fingerprint, other biometric data could be used - for example, voice recognition (using the mobile terminal's built-in microphone and a voice recognition algorithm within the mobile terminal 1 or SIM card 15) or retinal scanning (using the mobile terminal's built-in camera). Waters at Page 15 of 38 Arrangements (1) and (2) above may advantageously be combined with an RF tag 41 that automatically deactivates after it has been read by a reader. That is, the user will activate the RF tag by entering their PIN or biometric data prior to bringing the mobile terminal 1 into proximity to the reader. After successful reading of the RF tag 41, the RF tag automatically disables itself so that no further reading can occur without the PIN or biometric data being re-entered. If the mobile terminal 1 is lost or stolen, an unauthorised person cannot use the RF tag 41. Arrangements (1) and (2) above are fairly inconvenient if a user wishes to activate their RF tag 41 fairly frequently. The following arrangements may be more convenient when relatively frequent activation of the RF tag 41 is required: Waters at Page 15 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO-IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID). Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill
--	---

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[1.5]	wherein the value of the parameter that is sensed comprises a signal, a number, a word, a code, a velocity, an acceleration, a time-of-day, a position, a humidity, a temperature, a height, a level of brightness, a level of darkness, a blood pressure, a heart rate, a blood content, a physiological state and/or a psychological state.	Waters discloses “wherein the value of the parameter that is sensed comprises a signal, a number, a word, a code, a velocity, an acceleration, a time-of-day, a position, a humidity, a temperature, a height, a level of brightness, a level of darkness, a blood pressure, a heart rate, a blood content, a physiological state and/or a psychological state.” See e.g.: According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible). Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[2.1]	The method of claim 1, further comprising:	To the extent the preamble is limiting, Waters discloses “the method of claim 1, further comprising:” See e.g.: Claim 1, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[2.2]	repeatedly sensing said value of the parameter and repeatedly deciding, based on comparing the value of the parameter to the criterion, whether or not to maintain enabled a first function of the smartphone while maintaining disabled a second function of the smartphone; and	Waters discloses “repeatedly sensing said value of the parameter and repeatedly deciding, based on comparing the value of the parameter to the criterion, whether or not to maintain enabled a first function of the smartphone while maintaining disabled a second function of the smartphone; and” See e.g.: According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible). Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group,

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[2.3]	maintaining enabled said first function while maintaining disabled said second function responsive to deciding that said value of the parameter continues to satisfy the criterion; or	Waters discloses “maintaining enabled said first function while maintaining disabled said second function responsive to deciding that said value of the parameter continues to satisfy the criterion; or” See e.g.: According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible).

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of
--	--

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[2.4]	disabling said first function and enabling said second function responsive to deciding that the value of the parameter no longer satisfies the criterion.	Waters discloses “disabling said first function and enabling said second function responsive to deciding that the value of the parameter no longer satisfies the criterion.” See e.g.: Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		The near field tag 41 may be selectively enabled and disabled in order to reduce the opportunity to obtain information from the near field tag 41 by an unauthorised reader. The following arrangements are useful if the near field tag 41 is to be enabled and disabled for fairly long periods of time: Waters at Page 14 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[3.1]	The method of claim 1, wherein following said establishing the capability at the smartphone, the method further comprises:	To the extent the preamble is limiting, Waters discloses “The method of claim 1, wherein following said establishing the capability at the smartphone, the method further comprises:” See e.g.: Claim 1, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[3.2]	responsive to satisfying a proximity condition and responsive to sensing the value of the parameter and determining that the value of the parameter sensed satisfies the criterion, using the capability to	Waters discloses “responsive to satisfying a proximity condition and responsive to sensing the value of the parameter and determining that the value of the parameter sensed satisfies the criterion, using the capability to conduct the financial transaction that has been established at the smartphone and conducting the financial transaction by paying for a product;” See e.g.:

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	conduct the financial transaction that has been established at the smartphone and conducting the financial transaction by paying for a product;	According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible). Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different
--	--	--

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO-IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID). Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[3.3]	wherein said paying for a product comprises sensing that the proximity condition is satisfied relative to an access point maintained by a vendor at a point of purchase counter, by detecting a short-range signal that is transmitted by the access point, determining that the value of the parameter that is sensed satisfies the criterion and then, responsive to having sensed	Waters discloses “wherein said paying for a product comprises sensing that the proximity condition is satisfied relative to an access point maintained by a vendor at a point of purchase counter, by detecting a short-range signal that is transmitted by the access point, determining that the value of the parameter that is sensed satisfies the criterion and then, responsive to having sensed that the proximity condition is satisfied relative to the access point and having determined that the value of the parameter sensed satisfies the criterion, paying for the product by selectively sending information to at least one device;” See e.g.: In the second example, a user wishes to use the near field tag 41 of the mobile terminal 1 to pay for travel by public transport (for example on the London

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	that the proximity condition is satisfied relative to the access point and having determined that the value of the parameter sensed satisfies the criterion, paying for the product by selectively sending information to at least one device;	Underground), where entry barriers are equipped with a suitable near field tag reader. Because the commuter travels at particular, consistent times of day, it is desirable to enable the near field tag 41 only at those times, in order to provide improved security. When so configured, if the mobile terminal 1 incorporating the near field tag 41 were stolen, the thief would not be able to pay for use of public transport using the near field tag 41 outside the times specified. Waters at Page 12 of 38 A similar arrangement could be used, for example, to enable a school child to pay for their lunch using the near field tag 41. OTA messages would be sent at the beginning and the end of the school lunch time so that the near field tag 41 could only be used to make a payment during the appropriate time. The times at which, and the circumstances in which, the OTA messages are sent by the mobile telecommunications network 3 to the user's SIM card 15 may be set by the user of the mobile terminal 1. For example, the user of the mobile terminal 1 may initiate a communication session (such as a SIP communication session) with the mobile telecommunications network 1 to configure the times or places in which the RF tag 41 should be enabled. This updating process may require entry of a password, or employ some other security mechanism, to prevent unauthorised persons from reconfiguring the times and/or locations at which the near field tag is rendered operable or inoperable. Alternatively, the user may configure the times and/or locations at which the OTA messages are sent by some other mechanism - for example, by providing verbal instructions to the operator of mobile telecommunications network 3 by a mobile or PSTN telephone call, or by visiting the website of the mobile telecommunications network operator (whether using the mobile terminal 1 or independently thereof using a PC connected to the Internet). Waters at Page 12 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of
--	---	---

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[3.4]	wherein said paying for the product by selectively sending information to at least one device comprises selectively and wirelessly transmitting information to the at least one device using unlicensed frequencies; and	Waters discloses “wherein said paying for the product by selectively sending information to at least one device comprises selectively and wirelessly transmitting information to the at least one device using unlicensed frequencies; and” See e.g.: As shown in Figure 2, mobile terminal 1 in accordance with the embodiment includes, in addition to SIM 15, a display 34, keypad 37 and an antenna 39 for communicating wirelessly with the mobile communications network 3. Further, the mobile terminal 1 includes a near field or RFID tag 41. The near field tag 41 operates in the unregulated RF band of 13.56 MHz in this embodiment although other frequencies could be used. No licences are required for the use of the near field devices in this RF band. However, each country imposes certain limitations on the electromagnetic emissions in this RF band. Limitations mean that in practice the distance at which the near field tag 41 can communicate with another device is typically less than 20 centimetres. Often the range of communication is such that the RF tag 41 must touch or almost touch the device with which it is to communicate. Communication may be using the Near Field Communication Interface and Protocol (NFCIP-I). Waters at Page 09 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[3.5]	wherein said paying for the product by selectively sending information to at least one device is further	Waters discloses “wherein said paying for the product by selectively sending information to at least one device is further responsive to said selectively requesting

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	responsive to said selectively requesting an authorization, said receiving the authorization and said establishing the capability at the smartphone.	an authorization, said receiving the authorization and said establishing the capability at the smartphone.” See e.g.: The near field tag 41 may be selectively enabled and disabled in order to reduce the opportunity to obtain information from the near field tag 41 by an unauthorised reader. The following arrangements are useful if the near field tag 41 is to be enabled and disabled for fairly long periods of time: Waters at Page 14 of 38 (1) Personal identification number (PESf) entry - the keypad 37 of the mobile terminal 1 is used to enter a PIN (or other secret password) to enable the near field tag 41. The user's PIN may be stored in a secure location in the mobile terminal 1 or in the SIM 15. When the user enters their PIN using the keypad 37, the entered PIN is compared with the stored PIN. If the PINs match, the SIM transmits a message, via link 43, to the near field tag 41 to activate the near field tag. (2) Biometric data entry - the mobile terminal 1 may incorporate a fingerprint reader 45. The fingerprint reader 45 scans the fingerprint of the user when the user's finger is placed on the reader 45 and compares it to the user's fingerprint stored in the memory of the mobile terminal 1 or the SIM 15. If the fingerprints are determined to match, the message is sent from the SIM 15, via link 43, to the RF tag 41. As an alternative to a fingerprint, other biometric data could be used - for example, voice recognition (using the mobile terminal's built-in microphone and a voice recognition algorithm within the mobile terminal 1 or SIM card 15) or retinal scanning (using the mobile terminal's built-in camera). Waters at Page 15 of 38 Arrangements (1) and (2) above may advantageously be combined with an RF tag 41 that automatically deactivates after it has been read by a reader. That is, the user will activate the RF tag by entering their PIN or biometric data prior to bringing the mobile terminal 1 into proximity to the reader. After successful reading of the RF tag 41, the RF tag automatically disables itself so that no
--	---	---

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		further reading can occur without the PIN or biometric data being re-entered. If the mobile terminal 1 is lost or stolen, an unauthorised person cannot use the RF tag 41. Arrangements (1) and (2) above are fairly inconvenient if a user wishes to activate their RF tag 41 fairly frequently. The following arrangements may be more convenient when relatively frequent activation of the RF tag 41 is required: Waters at Page 15 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[4.1]	The method of claim 3, wherein said paying for a product further comprises deducting/withdrawing an amount of money from an account.	To the extent the preamble is limiting, Waters discloses “The method of claim 3, wherein said paying for a product further comprises deducting/withdrawing an amount of money from an account.” See e.g.: In the second example, a user wishes to use the near field tag 41 of the mobile terminal 1 to pay for travel by public transport (for example on the London Underground), where entry barriers are equipped with a suitable near field tag reader. Because the commuter travels at particular, consistent times of day, it is desirable to enable the near field tag 41 only at those times, in order to provide improved security. When so configured, if the mobile terminal 1 incorporating the near field tag 41 were stolen, the thief would not be able to pay for use of public transport using the near field tag 41 outside the times specified. Waters at Page 12 of 38 A similar arrangement could be used, for example, to enable a school child to pay for their lunch using the near field tag 41. OTA messages would be sent at the beginning and the end of the school lunch time so that the near field tag 41 could only be used to make a payment during the appropriate time. The times at which,

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		and the circumstances in which, the OTA messages are sent by the mobile telecommunications network 3 to the user's SIM card 15 may be set by the user of the mobile terminal 1. For example, the user of the mobile terminal 1 may initiate a communication session (such as a SIP communication session) with the mobile telecommunications network 1 to configure the times or places in which the RF tag 41 should be enabled. This updating process may require entry of a password, or employ some other security mechanism, to prevent unauthorised persons from reconfiguring the times and/or locations at which the near field tag is rendered operable or inoperable. Alternatively, the user may configure the times and/or locations at which the OTA messages are sent by some other mechanism - for example, by providing verbal instructions to the operator of mobile telecommunications network 3 by a mobile or PSTN telephone call, or by visiting the website of the mobile telecommunications network operator (whether using the mobile terminal 1 or independently thereof using a PC connected to the Internet). Waters at Page 12 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[5.1]	The method of claim 4,	To the extent the preamble is limiting, Waters discloses “The method of claim 4,” See e.g.: Claim 4, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[5.2]	wherein said selectively sending information to at least one device comprises selectively sending information to the access point maintained by the vendor at the point of purchase counter and to at least one other device that is predetermined; and	Waters discloses “wherein said selectively sending information to at least one device comprises selectively sending information to the access point maintained by the vendor at the point of purchase counter and to at least one other device that is predetermined; and” See e.g.: Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 In the second example, a user wishes to use the near field tag 41 of the mobile terminal 1 to pay for travel by public transport (for example on the London Underground), where entry barriers are equipped with a suitable near field tag reader. Because the commuter travels at particular, consistent times of day, it is desirable to enable the near field tag 41 only at those times, in order to provide improved security. When so configured, if the mobile terminal 1 incorporating the near field tag 41 were stolen, the thief would not be able to pay for use of public transport using the near field tag 41 outside the times specified. Waters at Page 12 of 38 A similar arrangement could be used, for example, to enable a school child to pay for their lunch using the near field tag 41. OTA messages would be sent at the beginning and the end of the school lunch time so that the near field tag 41 could only be used to make a payment during the appropriate time. The times at which, and the circumstances in which, the OTA messages are sent by the mobile telecommunications network 3 to the user's SIM card 15 may be set by the user of the mobile terminal 1. For example, the user of the mobile terminal 1 may initiate a communication session (such as a SIP communication session) with the mobile telecommunications network 1 to configure the times or places in which the RF tag 41 should be enabled. This updating process may require entry of a password, or employ some other security mechanism, to prevent unauthorised persons from reconfiguring the times and/or locations at which the near field tag is rendered operable or inoperable. Alternatively, the user may configure the times and/or locations at which the OTA messages are sent by some other mechanism - for example, by providing verbal instructions to the operator of mobile telecommunications network 3 by a mobile or PSTN telephone call, or by visiting the website of the mobile telecommunications network operator (whether
--	---

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		using the mobile terminal 1 or independently thereof using a PC connected to the Internet). Waters at Page 12 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[5.3]	wherein the method further comprises selectively receiving information from the access point maintained by the vendor at the point of purchase counter and from at least one other device that is predetermined.	Waters discloses “wherein the method further comprises selectively receiving information from the access point maintained by the vendor at the point of purchase counter and from at least one other device that is predetermined.” See e.g.: Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO- IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID). Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[6.1]	The method of claim 4, wherein said using unlicensed frequencies comprises using unlicensed frequencies over a short-range link in a Time Division Duplex operation.	To the extent the preamble is limiting, Waters discloses “The method of claim 4, wherein said using unlicensed frequencies comprises using unlicensed frequencies over a short-range link in a Time Division Duplex operation.” See e.g.: Claim 4, supra.

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		As shown in Figure 2, mobile terminal 1 in accordance with the embodiment includes, in addition to SIM 15, a display 34, keypad 37 and an antenna 39 for communicating wirelessly with the mobile communications network 3. Further, the mobile terminal 1 includes a near field or RFID tag 41. The near field tag 41 operates in the unregulated RF band of 13.56 MHz in this embodiment although other frequencies could be used. No licences are required for the use of the near field devices in this RF band. However, each country imposes certain limitations on the electromagnetic emissions in this RF band. Limitations mean that in practice the distance at which the near field tag 41 can communicate with another device is typically less than 20 centimetres. Often the range of communication is such that the RF tag 41 must touch or almost touch the device with which it is to communicate. Communication may be using the Near Field Communication Interface and Protocol (NFCIP-I). Waters at Page 09 of 38 [3.4], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[7.1]	The method of claim 1, wherein prior to said selectively requesting an authorization the method comprises:	To the extent the preamble is limiting, Waters discloses “The method of claim 1, wherein prior to said selectively requesting an authorization the method comprises:” See e.g.: Claim 1, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[7.2]	enabling a first function of the smartphone while disabling a second function of the smartphone responsive to sensing the parameter and responsive to determining that the parameter sensed satisfies the criterion; then	Waters discloses “enabling a first function of the smartphone while disabling a second function of the smartphone responsive to sensing the parameter and responsive to determining that the parameter sensed satisfies the criterion; then” See e.g.: According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible). Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41. Waters at Page 11 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[7.3]	selectively communicating with a device by using a communications capability of the first function, selectively establishing the master-slave relationship with the device and selectively requesting from the device the authorization to establish the capability for conducting the financial transaction.	Waters discloses “selectively communicating with a device by using a communications capability of the first function, selectively establishing the master-slave relationship with the device and selectively requesting from the device the authorization to establish the capability for conducting the financial transaction.” See e.g.: [1.2], [1.3], and [1.4], supra. According to an important feature of this embodiment, the near field tag 41 is selectively enabled or disabled for communication with the reader under control of the SIM 15, by means of communication link 43. By means of the link 43, the

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	SIM can enable or disable the near field tag 41 by, for example, rendering its antenna inoperative. In the disabled state, a reader is not able to obtain any information from the near field tag 41, even when brought into close proximity thereto (within a range that, in normal circumstances, near field communication would be possible). Waters at Page 10 of 38 Conveniently, the SIM 15 is provided with data which controls operation of the near field tag 41 by receiving an OTA message, which is sent to the mobile terminal 1 from the mobile telecommunications network 3 (via the OTA gateway 30 and SMSC 32). As described above, the OTA update message is received by the mobile terminal 1 and it is determined that this is an updating OTA update message rather than a conventional SMS message. The message is then passed to the SIM 15 for processing. Upon processing of the message, commands contained within that message are executed, causing the desired control of the RF tag 41 via the link 43. In a first example, it is desired to only enable the near field tag 41 to communicate with the reader when it is in the vicinity of the user's office (where entry is obtained using the near field tag 41). The SMSC 32 may send an OTA update message to the node B 5 associated with the cell or group of cells in which the user's office is located. When the mobile terminal 1 enters a cell in the group, the node B transmits the OTA message to the mobile terminal 1. The procedure described above is applied, and the OTA message is passed to the SIM 15 and the instructions therein are processed. A command is sent to the near field tag 41 via link 43 to activate the near field tag (for example, by allowing its antenna to communicate with the reader). When the mobile terminal 1 moves to a different cell, a command is sent from the SIM 15, via the link 43, to disable the near field tag 41. This command may be issued in response to a further OTA message being received from the network 3 when the mobile terminal 1 moves to a different cell, or movement to a different cell may be detected automatically by the SIM (or the mobile terminal 1) and used to generate an appropriate command for sending to the near field tag 41.
--	--

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	Waters at Page 11 of 38 The near field tag 41 may be selectively enabled and disabled in order to reduce the opportunity to obtain information from the near field tag 41 by an unauthorised reader. The following arrangements are useful if the near field tag 41 is to be enabled and disabled for fairly long periods of time: Waters at Page 14 of 38 (1) Personal identification number (PESf) entry - the keypad 37 of the mobile terminal 1 is used to enter a PIN (or other secret password) to enable the near field tag 41. The user's PIN may be stored in a secure location in the mobile terminal 1 or in the SIM 15. When the user enters their PIN using the keypad 37, the entered PIN is compared with the stored PIN. If the PINs match, the SIM transmits a message, via link 43, to the near field tag 41 to activate the near field tag. (2) Biometric data entry - the mobile terminal 1 may incorporate a fingerprint reader 45. The fingerprint reader 45 scans the fingerprint of the user when the user's finger is placed on the reader 45 and compares it to the user's fingerprint stored in the memory of the mobile terminal 1 or the SIM 15. If the fingerprints are determined to match, the message is sent from the SIM 15, via link 43, to the RF tag 41. As an alternative to a fingerprint, other biometric data could be used - for example, voice recognition (using the mobile terminal's built-in microphone and a voice recognition algorithm within the mobile terminal 1 or SIM card 15) or retinal scanning (using the mobile terminal's built-in camera). Waters at Page 15 of 38 Arrangements (1) and (2) above may advantageously be combined with an RF tag 41 that automatically deactivates after it has been read by a reader. That is, the user will activate the RF tag by entering their PIN or biometric data prior to bringing the mobile terminal 1 into proximity to the reader. After successful reading of the RF tag 41, the RF tag automatically disables itself so that no further reading can occur without the PIN or biometric data being re-entered. If the mobile terminal 1 is lost or stolen, an unauthorised person cannot use the RF
--	--

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		tag 41. Arrangements (1) and (2) above are fairly inconvenient if a user wishes to activate their RF tag 41 fairly frequently. The following arrangements may be more convenient when relatively frequent activation of the RF tag 41 is required: Waters at Page 15 of 38 The near field tag 41 may operate in accordance with ISO-IEC 14443 and ISO-IEC 15693 standards. The tag 41 includes an inbuilt inductive antenna that allows the card to exchange information with a tag reader when the two are brought into close proximity, as described above. The reader may emit an RF signal to supply power to the tag to communicate with it if the tag is "passive". If the tag is "active" it will have a power supply and its operation is independently of the reader. The near field tag 41 may transmit selected information, such as an ID number (GU ID). Waters at Page 10 of 38 Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[8.1]	A smartphone that is configured to perform operations in order to establish a capability to conduct a financial transaction; the operations comprising:	To the extent the preamble is limiting, Waters discloses “A smartphone that is configured to perform operations in order to establish a capability to conduct a financial transaction; the operations comprising:” See e.g.: [1.1], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[8.2]	responsive to sensing a value of a parameter and responsive to determining that the value of the parameter sensed satisfies a criterion, selectively establishing a master-slave relationship, and selectively requesting an authorization to establish said capability; then	Waters discloses “responsive to sensing a value of a parameter and responsive to determining that the value of the parameter sensed satisfies a criterion, selectively establishing a master-slave relationship, and selectively requesting an authorization to establish said capability; then” See e.g.: [1.2], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[8.3]	receiving the authorization to establish the capability, responsive to said selectively requesting an authorization, and establishing the capability at the smartphone responsive to said receiving the authorization;	Waters discloses “receiving the authorization to establish the capability, responsive to said selectively requesting an authorization, and establishing the capability at the smartphone responsive to said receiving the authorization;” See e.g.: [1.3], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[8.4]	wherein said selectively establishing a master-slave relationship, said selectively requesting an authorization and said	Waters discloses “wherein said selectively establishing a master-slave relationship, said selectively requesting an authorization and said receiving the authorization comprises wirelessly transmitting/receiving using a WiFi air interface protocol, an Orthogonal Frequency Division Multiplexing air interface protocol and/or an

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	receiving the authorization comprises wirelessly transmitting/receiving using a WiFi air interface protocol, an Orthogonal Frequency Division Multiplexing air interface protocol and/or an Orthogonal Frequency Division Multiple Access air interface protocol; and	Orthogonal Frequency Division Multiple Access air interface protocol; and” See e.g.: [1.4], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[8.5]	wherein the value of the parameter that is sensed comprises a signal, a number, a word, a code, a velocity, an acceleration, a time-of-day, a position, a humidity, a temperature, a height, a level of brightness, a level of darkness, a blood pressure, a heart rate, a blood content, a physiological state and/or a psychological state.	Waters discloses “wherein the value of the parameter that is sensed comprises a signal, a number, a word, a code, a velocity, an acceleration, a time-of-day, a position, a humidity, a temperature, a height, a level of brightness, a level of darkness, a blood pressure, a heart rate, a blood content, a physiological state and/or a psychological state.” See e.g.: [1.5], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[9.1]	The smartphone of claim 8, wherein the operations further comprise:	To the extent the preamble is limiting, Waters discloses “the smartphone of claim 8, wherein the operations further comprise:” See e.g.: Claim 8, supra.

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[9.2]	repeatedly sensing said value of the parameter and repeatedly deciding, based on comparing the value of the parameter to the criterion, whether or not to maintain enabled a first function of the smartphone while maintaining disabled a second function of the smartphone; and	Waters discloses “repeatedly sensing said value of the parameter and repeatedly deciding, based on comparing the value of the parameter to the criterion, whether or not to maintain enabled a first function of the smartphone while maintaining disabled a second function of the smartphone; and” See e.g.: [2.2], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[9.3]	maintaining enabled said first function while maintaining disabled said second function responsive to deciding that said value of the parameter continues to satisfy the criterion; or	Waters discloses “maintaining enabled said first function while maintaining disabled said second function responsive to deciding that said value of the parameter continues to satisfy the criterion; or” See e.g.: [2.3], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[9.4]	disabling said first function and enabling said second function responsive to deciding that the value of the parameter no longer satisfies the criterion.	Waters discloses “disabling said first function and enabling said second function responsive to deciding that the value of the parameter no longer satisfies the criterion.” See e.g.: [2.4], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.1]	The smartphone of claim 8, wherein following said establishing the capability at the smartphone, the operations further comprise:	To the extent the preamble is limiting, Waters discloses “the smartphone of claim 8, wherein following said establishing the capability at the smartphone, the operations further comprise.” See e.g.: Claim 8, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.2]	responsive to satisfying a proximity condition and responsive to sensing the value of the parameter and determining that the value of the parameter sensed satisfies the	Waters discloses “responsive to satisfying a proximity condition and responsive to sensing the value of the parameter and determining that the value of the parameter sensed satisfies the criterion, using the capability that has been established at the smartphone to conduct the financial transaction and conducting the financial transaction by paying for a product;” See e.g.:

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	criterion, using the capability that has been established at the smartphone to conduct the financial transaction and conducting the financial transaction by paying for a product;	[3.2], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.3]	wherein said paying for a product comprises sensing that the proximity condition is satisfied relative to an access point maintained by a vendor at a point of purchase counter, by detecting a short-range signal that is transmitted by the access point, determining that the value of the parameter that is sensed satisfies the criterion and then, responsive to having sensed that the proximity condition is satisfied relative to the access point and having determined that the value of the parameter sensed satisfies the criterion, paying for said product by selectively sending information to at least one device;	Waters discloses “wherein said paying for a product comprises sensing that the proximity condition is satisfied relative to an access point maintained by a vendor at a point of purchase counter, by detecting a short-range signal that is transmitted by the access point, determining that the value of the parameter that is sensed satisfies the criterion and then, responsive to having sensed that the proximity condition is satisfied relative to the access point and having determined that the value of the parameter sensed satisfies the criterion, paying for said product by selectively sending information to at least one device;” See e.g.: [3.3], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.4]	wherein said selectively sending information to at least one device comprises selectively and wirelessly transmitting the information to the	Waters discloses “wherein said selectively sending information to at least one device comprises selectively and wirelessly transmitting the information to the at least one device using unlicensed frequencies;” See e.g.: [3.4], supra.

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	at least one device using unlicensed frequencies;	Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.5]	wherein said paying for the product by selectively sending information to at least one device comprises selectively and wirelessly transmitting information to the at least one device using unlicensed frequencies; and	Waters discloses “wherein said paying for the product by selectively sending information to at least one device comprises selectively and wirelessly transmitting information to the at least one device using unlicensed frequencies; and” See e.g.: [3.4], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[10.6]	wherein said paying for the product by selectively sending information to at least one device is further responsive to said selectively requesting an authorization, said receiving the authorization and said establishing the capability at the smartphone.	Waters discloses “wherein said paying for the product by selectively sending information to at least one device is further responsive to said selectively requesting an authorization, said receiving the authorization and said establishing the capability at the smartphone.” See e.g.: [3.5], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[11.1]	The smartphone of claim 10, wherein said paying for a product further comprises deducting/withdrawing an amount of money from an account.	To the extent the preamble is limiting, Waters discloses “the smartphone of claim 10, wherein said paying for a product further comprises deducting/withdrawing an amount of money from an account.” See e.g.: Claim 10, supra. [4.1], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[12.1]	The smartphone of claim 11,	Waters discloses “The smartphone of claim 11,” See e.g.: Claim 11, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[12.2]	wherein said selectively sending information to at least one device comprises selectively sending information to the access point maintained by the vendor at the point of purchase counter and to at	Waters discloses “wherein said selectively sending information to at least one device comprises selectively sending information to the access point maintained by the vendor at the point of purchase counter and to at least one other device that is predetermined; and” See e.g.: [5.2], supra.

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	least one other device that is predetermined; and	Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[12.3]	wherein the operations further comprise selectively receiving information from the access point maintained by the vendor at the point of purchase counter and from at least one other device that is predetermined.	Waters discloses “wherein the operations further comprise selectively receiving information from the access point maintained by the vendor at the point of purchase counter and from at least one other device that is predetermined.” See e.g.: [5.3], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[13.1]	The smartphone of claim 10, wherein said using unlicensed frequencies comprises using unlicensed frequencies over a short-range link in Time Division Duplex operation.	Waters discloses “the smartphone of claim 10, wherein said using unlicensed frequencies comprises using unlicensed frequencies over a short-range link in Time Division Duplex operation.” See e.g.: Claim 10, supra. [6.1], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

		embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[14.1]	The smartphone of claim 8, wherein prior to said selectively requesting an authorization the operations comprise:	To the extent the preamble is limiting, Waters discloses “the smartphone of claim 8, wherein prior to said selectively requesting an authorization the operations comprise:” See e.g.: Claim 8, supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[14.2]	enabling a first function of the smartphone while disabling a second function of the smartphone responsive to sensing the parameter and responsive to determining that the parameter sensed satisfies the criterion; then	Waters discloses “enabling a first function of the smartphone while disabling a second function of the smartphone responsive to sensing the parameter and responsive to determining that the parameter sensed satisfies the criterion; then” See e.g.: [7.2], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
[14.3]	selectively communicating with a device by using a communications capability of the first function, selectively establishing the master-	Waters discloses “selectively communicating with a device by using a communications capability of the first function, selectively establishing the master-slave relationship with the device and selectively requesting from the device the

Exhibit 743-A16
Invalidity Chart for U.S. Patent No. 11,924,743 In View of Waters

	slave relationship with the device and selectively requesting from the device the authorization to establish the capability for conducting the financial transaction.	authorization to establish the capability for conducting the financial transaction.” See e.g.: [7.3], supra. Furthermore, this claim element is obvious in light of Waters itself, when combined with any of the other references as charted for this claim element in Exs. 743-A01-A23, Ex. 743-B, and/or when combined with the knowledge of one of ordinary skill in the art. Motivations to combine may come from the knowledge of the person of ordinary skill themselves, or from the known problems and predictable solutions as embodied in these references. Further motivations to combine references and additional details may be found in the Cover Pleading and Ex. 743-B.
--	--	---