HONIGMAN

Alliance Laundry Systems, LLC v. PayRange LLC

PGR2025-00027, U.S. Patent No. 11,966,920

PGR2025-00028, U.S. Patent No. 11,972,423

June 2, 2026

Sarah E. Waidelich & Scott D. Barnett, Honigman LLP
on behalf of Petitioner Alliance Laundry Systems, LLC

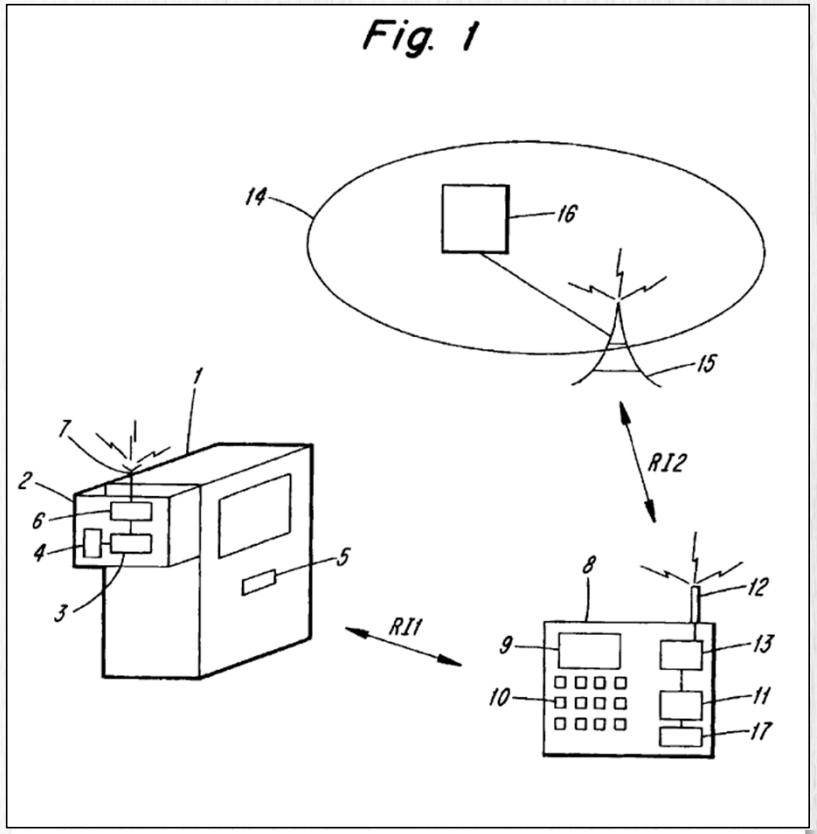
Alliance Laundry Systems

- Headquartered in Ripon, Wisconsin since its founding in 1908
- Global leader in manufacturing laundry machines
- Completed IPO on NYSE in October 2025

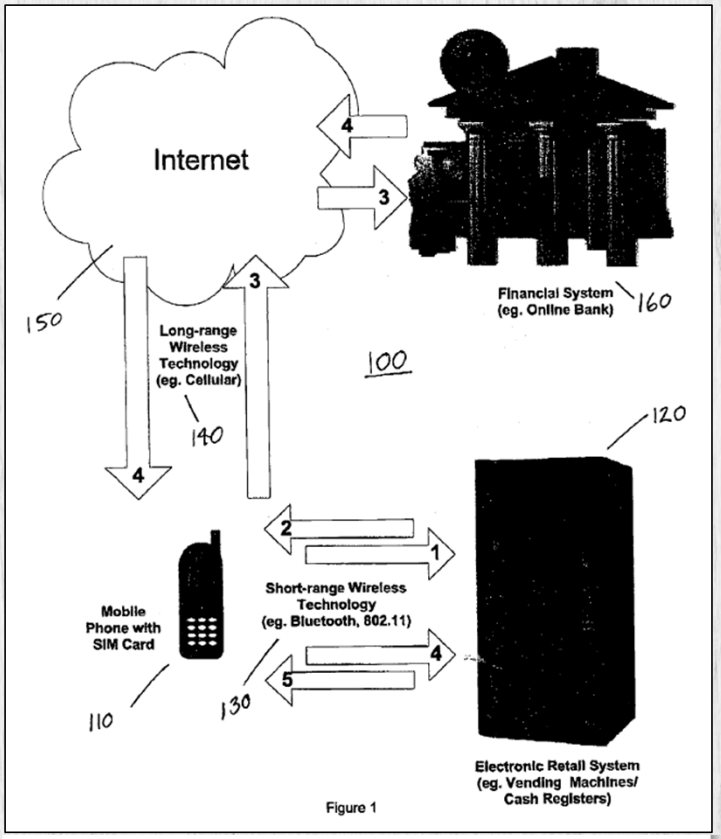


Demonstrative Exhibit - Not Evidence

State of the Art Prior to the PayRange Patents



Räsänen, Ex. 1014 (1999); -027 Pet. at 7-10



Athwal, Ex. 1016 (2002); -027 Pet. at 8-9

Demonstrative Exhibit - Not Evidence

PayRange Patents

- U.S. Patent Nos. 11,966,920 ("'920 Patent") and 11,972,423 ("'423 Patent") claim priority to provisional 61/917,936 filed Dec. 18, 2013

E.g., -027 Pet. at 1-4, 14

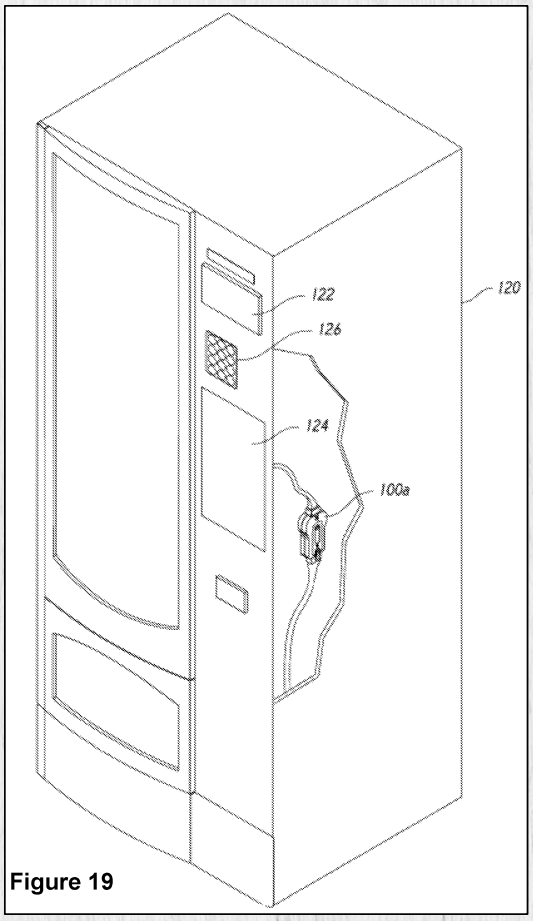


Figure 19

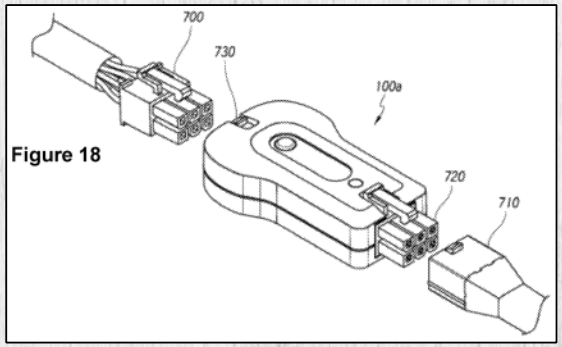
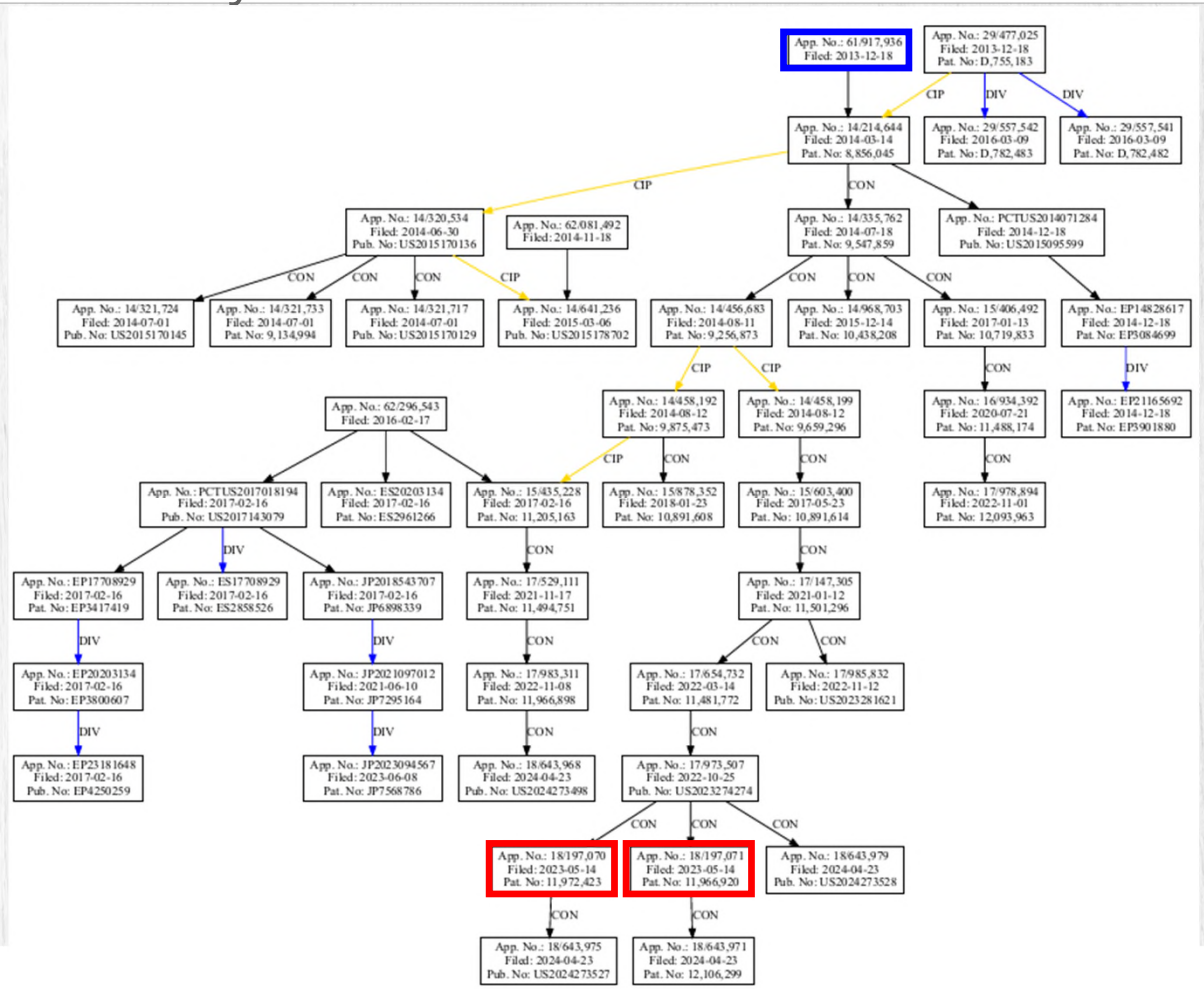


Figure 18

Ex. 1001, Figs. 18-19

Demonstrative Exhibit - Not Evidence

PayRange Patent Family



Demonstrative Exhibit - Not Evidence

All Claims of the ’920 Patent Are Unpatentable

Ground 1: Claims 1-10 and 12-20 Are Rendered Obvious Under 35 U.S.C. § 103(a) Over *Low* in View of *Arora* in further view of *Freeny*

Ground 2: Claim 11 is Rendered Obvious Under 35 U.S.C. § 103(a) Over *Low* in View of *Arora* in further view of *Freeny* and *Casey*

Ground 3: Claims 1-20 Are Ineligible Under 35 U.S.C. § 101

-027 Pet. at 6

All Claims of the ’423 Patent Are Unpatentable

Ground 1: Claims 1-6, 8, 10, and 12-20 Are Anticipated Under 35 U.S.C. § 102 Over *Low*

Ground 2: Claims 7 and 9 Are Rendered Obvious Under 35 U.S.C. § 103(a) Over *Low* in View of *Arora*

Ground 3: Claim 11 is Rendered Obvious Under 35 U.S.C. § 103(a) Over *Low* in View of *Arora* in further view of *Freeny* and *Casey*

Ground 4: Claims 1-20 Are Ineligible Under 35 U.S.C. § 101

-028 Pet. at 6

Demonstrative Exhibit - Not Evidence

Prior Art Grounds: Independent Claims

Demonstrative Exhibit - Not Evidence

Minor Differences Between the ’920 and ’423 Patent Claims

’920 Patent, Claim 1	’423 Patent, Claim 1
[1.2] identifying one or more payment accepting units that are available to accept payment from a mobile payment application executing on the mobile device, [1.3] the identifying based at least in part on an identifier or location corresponding to the one or more payment accepting units	*[1.2] identifying one or more payment accepting units in proximity to the mobile device that are available to accept payment from a mobile payment application executing on the mobile device, [1.3] the identifying based at least in part on an identifier ~~or location~~ corresponding to the one or more payment accepting units*
[1.10] wherein the user interface includes a visual representation of the available payment accepting unit, [1.11] an indication of a balance, and [1.12] an affordance that, in response to a user input, indicates completion of the transaction	*~~[1.10] wherein the user interface includes a visual representation of the available payment accepting unit, [1.11] an indication of a balance, and [1.12] an affordance that, in response to a user input, indicates completion of the transaction~~*

Disputed Limitations

’920 Patent	’423 Patent
[1.6] the user interface being configured to display a visual indication of the one or more payment accepting units	*[1.6] the user interface being configured to display a visual indication of the one or more payment accepting units*
[1.12] an affordance that, in response to a user input, indicates completion of the transaction	

Independent Claims 13 and 15 of the ’920 Patent recite the same limitations as limitations [1.6] and [1.12]. *See* Ex. 1010.

Independent Claims 13 and 15 of the ’423 Patent recite the same limitation as limitation [1.6]. *See* Ex. 1010.

The Supposed Invention of the Two PayRange Patents Was Already Disclosed by *Low*

"The present application generally relates to **electronic payments**, and more particularly, to wireless electronic payments to **non-Internet connected machines** through user devices."

Low, Ex. 1005 at 1:16-19 (emphasis added);
-027 Pet. at 17.

Low Teaches Limitation [1.6] of Both Patents

[1.6] the user interface being configured to display a visual indication of the one or more payment accepting units

"The non-Internet connected machine (NICM) transmits a machine identifier to the user device[.]"

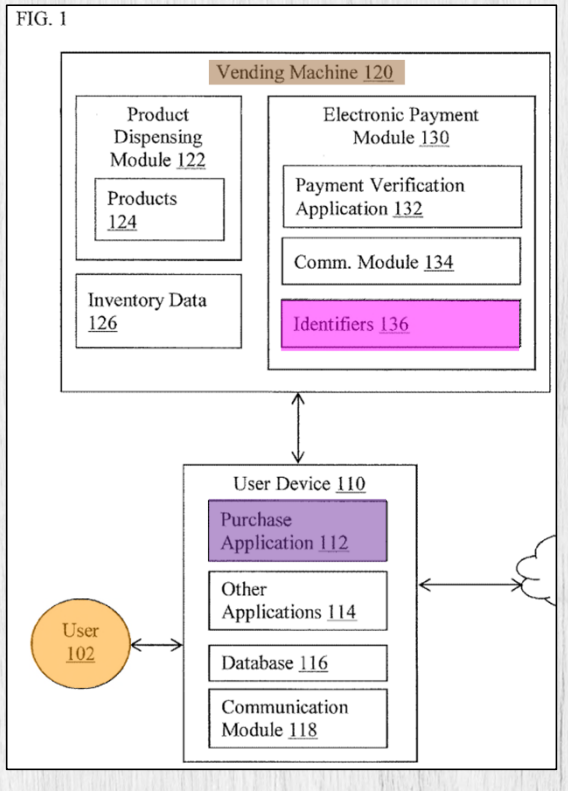
"[M]ultiple machines may send their unique identifiers, such that the user is able to select one or more machines to purchase from."

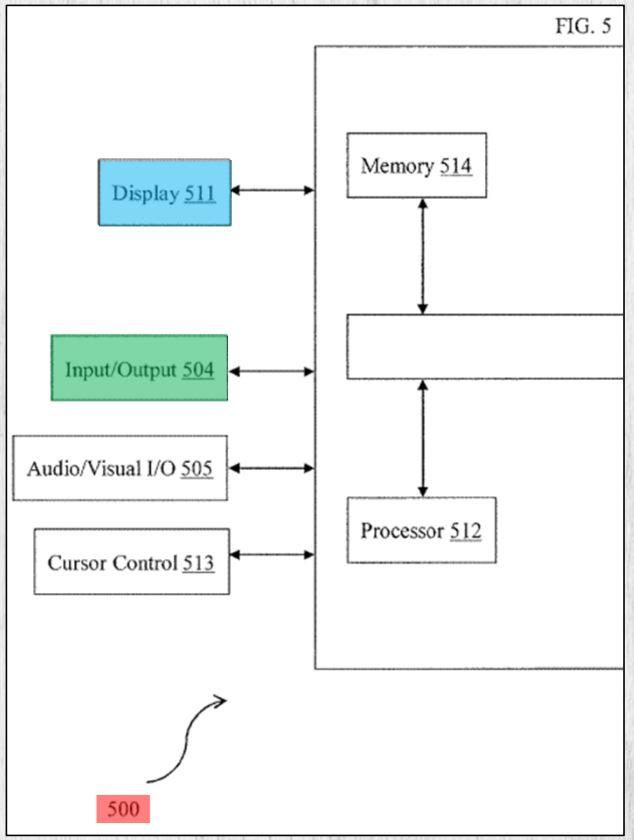
Low, Ex. 1005 at 2:16-28; -027 Pet. at 17, 36.

Low Teaches Limitation [1.6] of Both Patents

[1.6] the user interface ("[p]urchase application 112…provide[s] a convenient interface to permit user 102 to select, purchase, and dispense products for sale at a vending machine 120") *being configured to display* (via display 511) *a visual indication of the one or more payment accepting units* ("multiple machines may send their unique identifiers, such that the user is able to select one or more machines to purchase from" via I/O component 504).

Low, Ex. 1005 at 2:26-28, 3:57-60, 12:39-56, Figures 1, 5; -027 Pet. at 31-36.





Demonstrative Exhibit - Not Evidence

Low Teaches Limitation [1.6] of Both Patents

123. *Low* teaches that a "non-Internet connected machine (NICM) transmits a machine identifier to the user device, which allows the user device to retrieve a menu of items at the specific machine from the payment provider or an operator of the machine." Ex. 1005, 2:16-20. *Low* further teaches that the user device 110 may "receive a machine identifier from identifiers 136." *Id.*, 8:66-9:2. "[M]ultiple machines may send their unique identifiers, such that the user is able to select one or more machines to purchase from." *Id.*, 2:26-28. In my opinion, the user device 110 is configured to display the available machines such that the user is able to interact with the display to select the one or more machines from which to make a purchase."

Neuman Decl., Ex. 1003 at ¶ 123 (emphasis added);
-027 Pet. at 36.

Low Teaches Limitation [1.6] of Both Patents

125. In my opinion, the user device 110 is configured to display either

(i) the available machines such that the user is able to interact with the display to select the one or more machines from which to make a purchase or

(ii) products available at particular machines, whereby selecting the product(s) necessarily selects the available machine that offers the product(s)."

Neuman Decl., Ex. 1003 at ¶ 125;
-027 Pet. at 36-37.

". . . Low does not provide much detail concerning exactly what is shown in the display of user device 110 at various times throughout Low's purchase transaction. At the same time, however, claim 1 also is not very specific on this front. For example, limitation [1.6] merely requires the mobile device to be configured to display 'a visual indication of' the identified payment accepting unit(s), and does not specify exactly when the visual indication must be displayed."

Institution Decision, Paper 12, at 44-45.

Patent Owner Misconstrues Petitioner's Arguments Regarding Limitation [1.6]

Petition	Institution Decision	Patent Owner's Response
"A POSA would understand that the user device 110 [of *Low*] is configured to display the available machines such that the user is able to interact with the display to select the one or more machines from which to make a purchase." -027 Pet. at 36 (citing Ex. 1003, ¶ 123).	This "contention is supported by the cited disclosures in Low." PGR2025-00027, Paper 12 at 43. "In particular…in order for the user to select a specific vending machine 120 to make a purchase, user device 110 would necessarily 'display a visual indication' of that machine as broadly recited in limitation [1.6] (otherwise the user would not be able to make a selection)." *Id*. at 44.	"[T]he petition fails to show that Low discloses *[a] user interface* that is *configured to display a visual indication of the one or more payment accepting units* (limitation [1.6]) because it relies on an unsupported assertion that Low's user interface would inherently display *a visual indication* of the vending machine." PGR2025-00027, Paper 17 at 17-18.

Any Alternative Embodiment in *Low* is Irrelevant

"The anticipation analysis asks solely whether the prior art reference discloses and enables the claimed invention, and not…whether alternatives are also disclosed."

Hewlett–Packard Co. v. Mustek Sys., Inc., 340 F.3d 1314, 1324 & n.6 (Fed. Cir. 2003); -027 Reply at 17.

"The fact that another embodiment is disclosed does not detract from the remainder of the disclosure."

Seachange Int'l, Inc. v. C-COR, Inc., 413 F.3d 1361, 1380 (Fed. Cir. 2005); -027 Reply at 5.

Patent Owner Has No Evidence Rebutting Dr. Neuman's Actual Testimony

"In my opinion, the user device 110 is configured to display the available machines such that the user is able to interact with the display to select the one or more machines from which to make a purchase."

Neuman Decl., Ex. 1003 at ¶ 123; -027 Pet. at 36.

Q: "So why did you feel the need to emphasize that Low would not **necessarily** disclose it? Doesn't that imply that there are scenarios where Low would disclose it, but perhaps not all the time?

[Dr. Miller]: "Well, Low didn't explicitly state that he wouldn't display them, but he also did not state that he would. And I've provided in my declaration other ways to show that the machine identifiers do not need to be displayed in Low, for Low's system to still function."

Miller Dep. Tr., Ex. 1032 at 76:24-77:8 (emphasis added); -027 Reply at 3-5.

Patent Owner Only Contests Limitation [1.6] of the '423 Patent Independent Claims

'920 Patent	'423 Patent
[1.6] the user interface being configured to display a visual indication of the one or more payment accepting units	*[1.6] the user interface being configured to display a visual indication of the one or more payment accepting units*
[1.12] an affordance that, in response to a user input, indicates completion of the transaction	

Because *Low* teaches limitation [1.6] and identical limitations [13.9] and [15.5], *Low* anticipates independent Claims 1, 13, and 15 of the '423 Patent

Low Teaches Limitation [1.12] of the '920 Patent

[1.12] the user interface includes a visual representation of…an affordance that, in response to a user input, indicates completion of the transaction

"[T]he payment provider…may send product details to the user device to upsell or advertise products," including "displaying a message to user 102 after purchasing a drink such as, 'Would you like chips with your drink.'"

Low, Ex. 1005 at 2:20–23, 7:35–39 (emphasis added); -027 Pet. at 46-47.

Claim Construction of Limitation [1.12] of the '920 Patent

Claim Term	Petitioner's Proposed Construction	Patent Owner's Proposed Construction
[1.12] "[a] user interface includes . . . an affordance that, in response to a user input, indicates completion of the transaction"	Plain and ordinary meaning/ no additional construction necessary "affordance" encompasses a "message"-type GUI element *E.g.*, -027 Pet. at 47; -027 Reply at 5-12	"affordance" = "an interactive user interface element that informs a user how to interact with the element and its intended use" "affordance" does <u>not</u> encompass a "message"-type GUI element -027 POR at 7-8, 10

Patent Owner Concedes That *Low* Teaches a "Message"-Type GUI Element

"Low's message of 'Would you like chips with your drink' is…a message informing the user that a transaction has been completed."

-027 POR at 34.

Demonstrative Exhibit - Not Evidence

Patent Owner's Narrowing Construction is Wrong

1. Patent Owner's construction ignores the remaining language of limitation [1.12]

2. Patent Owner's construction would exclude the only embodiment in the '920 Patent indicating "completion of the transaction," which is a **message**

3. Patent Owner would apply its proposed construction differently for infringement and invalidity

See -027 Reply at 5-10.

Patent Owner Concedes its Interpretation Ignores the Remaining Language of Limitation [1.12]

"Petitioner sidesteps the issue by focusing its reply on a particular feature of the *affordance* recited in the claims. The issue, however, is the meaning of the term *affordance* itself . . ."

-027 Sur-Reply at 6.

"[T]he claims themselves provide substantial guidance as to the meaning of particular claim terms. To begin with, the context in which a term is used in the asserted claim can be highly instructive."

Phillips v. AWH Corp., 415 F.3d 1303, 1314 (Fed. Cir. 2005) (internal citation omitted); -027 Reply at 5-6.

The Only Specification Support for an "Affordance That . . . Indicates Completion of the Transaction" is a Message

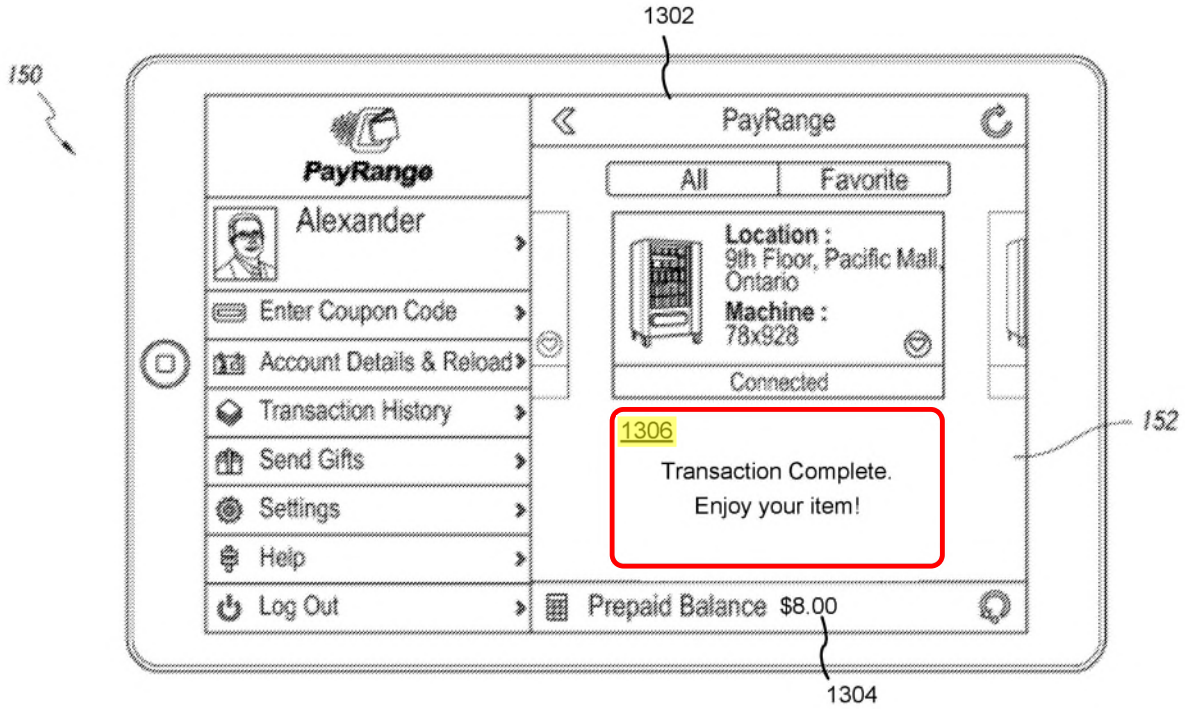


Figure 26A

'920 Patent, Ex. 1001 at Fig. 26A (annotated); -027 Reply at 8.

"[I]n FIG. 26A, the mobile device 150 displays user interface 1302 on touch screen 152 with a message 1306 that indicates that the first transaction is complete."

'920 Patent, Ex. 1001 at 34:19-22 (emphasis added); -027 Reply at 7-8.

Patent Owner's Interpretation Would Exclude the Only Disclosed Embodiment for Indicating "Completion of the Transaction"

Q: "Is element 1306 an affordance?"

[Dr. Miller]: "An affordance is an interactive user interface element that informs the user as to how to interact with the element and its intended use. The message indicated by 1306 would not be an affordance then."

Miller Dep. Tr., Ex. 1032 at 92:10-16; -027 Reply at 8.

Patent Owner's Interpretation Would Exclude the Only Disclosed Embodiment for Indicating "Completion of the Transaction"

"Indeed, if 'solder reflow temperature' were defined to mean liquidus temperature, a preferred (and indeed only) embodiment in the specification would not fall within the scope of the patent claim. Such an interpretation is rarely, if ever, correct and would require highly persuasive evidentiary support, which is wholly absent in this case."

Vitronics Corp. v. Conceptronic, Inc.,
90 F.3d 1576, 1583-84 (Fed. Cir. 1996) (emphasis added);
-027 Reply at 8.

Sliding the Dollar Bill *Initiates* a Transaction

"An interactive element that informs the user that the transaction **will be performed** when the user slides it is an affordance that, in response to user input, indicates **completion** of a transaction."

-027 Sur-Reply at 8 (emphasis added).

transaction **will be** performed

≠

indicate **completion** of the transaction

Demonstrative Exhibit - Not Evidence

Sliding the Dollar Bill *Initiates* a Transaction

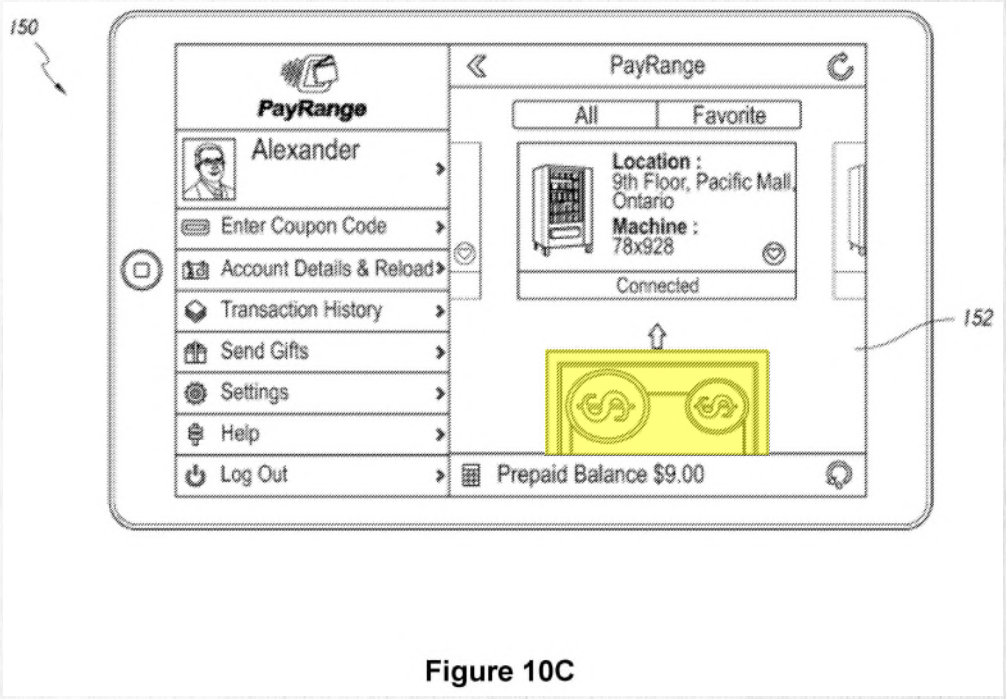


Figure 10C

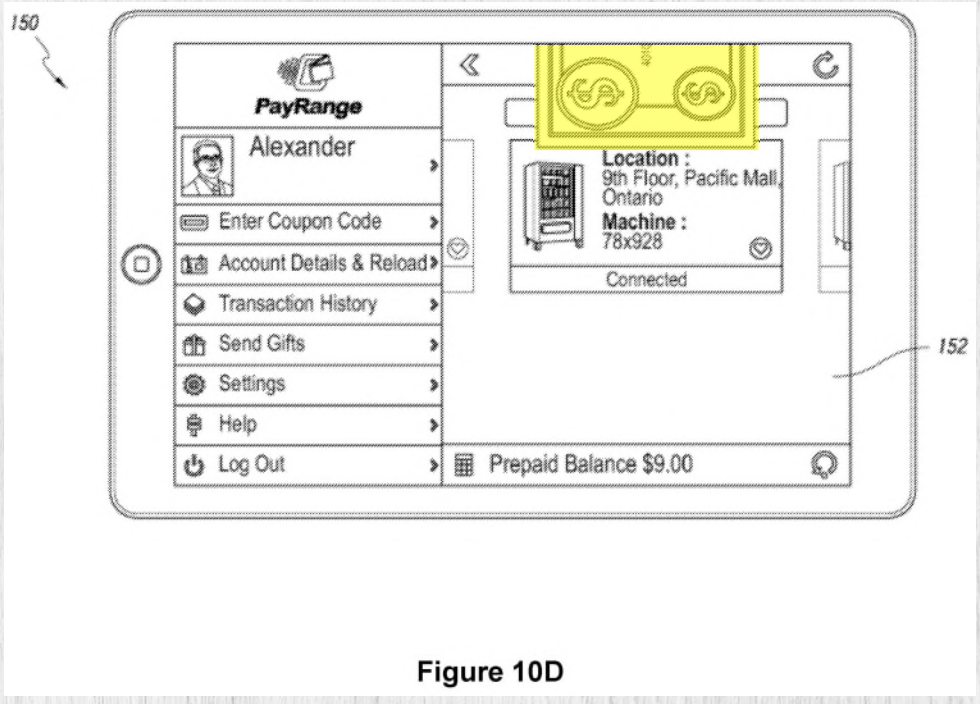


Figure 10D

'920 Patent, Ex. 1001 at Figures 10C and 10D (annotated); -027 Reply at 9.

Sliding the Dollar Bill *Initiates* a Transaction

"[W]ith reference to FIGS. 10C-10D, the user of the mobile device 150 initiates a transaction with the machine 120…by performing a swipe gesture at a location corresponding to the representation of the dollar bill."

'920 Patent, Ex. 1001 at 36:38-42 (emphasis added); -027 Reply at 9.

"The mobile application 140 might display (on the touch screen 152) a prepaid balance that the user 'swipes' to transfer payment to the payment accepting unit 120" and "[t]he transaction is completed just as if cash was inserted in the machine 120 with the user inputting his selection on the payment accepting unit 120 and the payment accepting unit 120 dispensing the product or service."

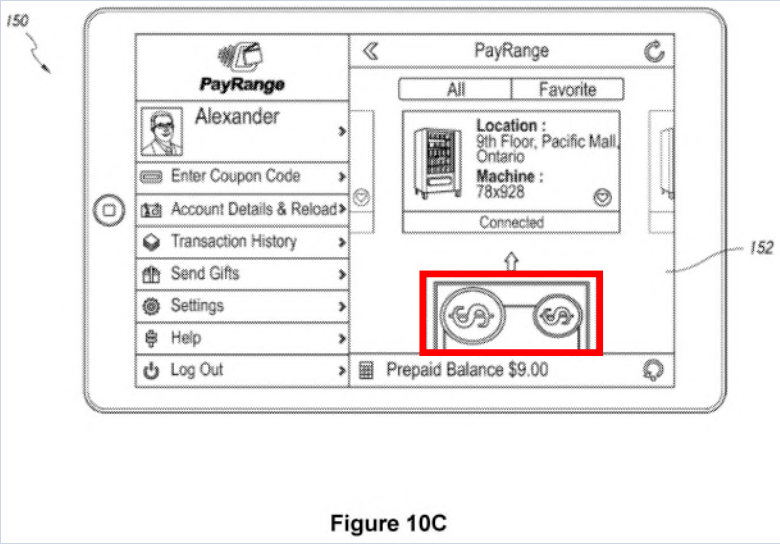
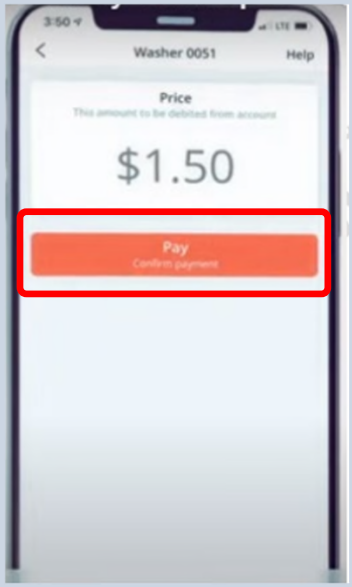
'920 Patent, Ex. 1001 at 7:22-31 (emphasis added); -027 Reply at 9.

Sliding the Dollar Bill *Initiates* a Transaction

'920 Patent	'423 Patent
*[1.12] an affordance that, in response to a user input, indicates **completion** of the transaction*	*[11.3] an affordance that when slid, indicates the **initiation** of the transaction;*

-027 Reply at 9-10.

Patent Owner Argues that a Single "Pay" Button Can Indicate Both "Initiation" and "Completion" in the Accused Product, but Not in the Prior Art

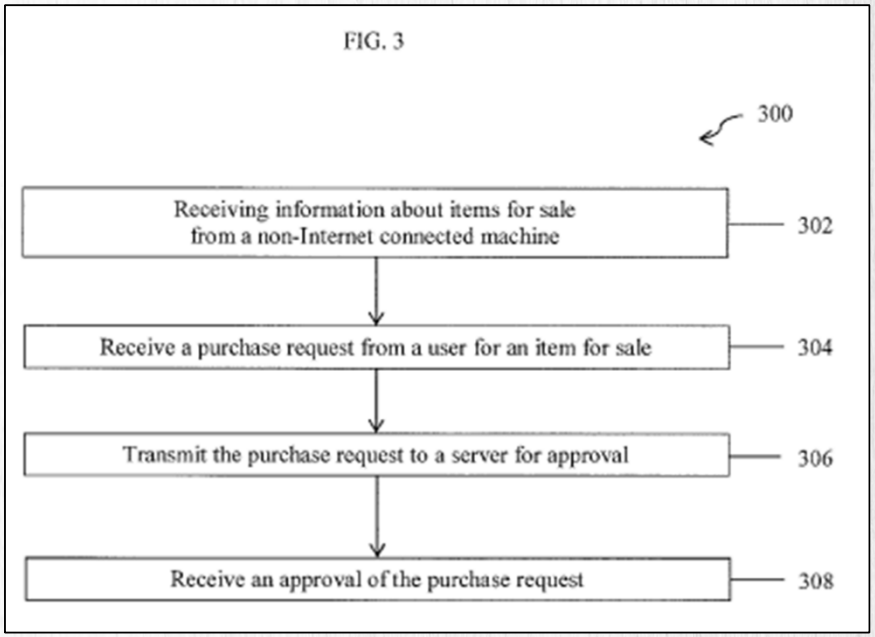
Patent Owner's Alleged Affordance that Indicates "Completion of a Transaction"	Petitioner's Accused Affordance that Indicates "Completion of a Transaction"	*Low's* Affordance that Indicates "Completion of a Transaction"
 Figure 10C		"[U]ser selects a payment button or option on the user device" which triggers an authorization procedure, resulting in the machine "dispens[ing] the purchased item(s) associated with the transaction number."
'920 Patent, Ex. 1001 at Figure 10C (annotated).	Patent Owner's infringement contentions, Ex. 1017 at 10 (annotated).	*Low*, Ex. 1005 at 2:46-62 (emphasis added).

Patent Owner Argues that a Single "Pay" Button Can Indicate Both "Initiation" and "Completion" in the Accused Product, but Not in the Prior Art

"A patent may not, like a 'nose of wax,' be twisted one way to avoid [invalidity] and another to find infringement."

Amazon.com, Inc. v. Barnesandnoble.com, Inc., 239 F.3d 1343, 1351 (Fed. Cir. 2001).

The Payment Step is the Same Between Alleged Multiple Embodiments in *Low*



"Fig. 3 is a flowchart illustrating a method for use by a user device for an electronic payment to a non-Internet connected device according to one embodiment."

"Once the user device has received information about items for sale at the non-Internet connected machine, the user device receives a purchase request for an item for sale at step 304. . .

. . . The purchase request may be received after a user utilizes user device 110 and/or vending machine 120 to select at least one product of products 124 for purchase."

-027 Pet. at 38-47; Reply at 11-12; *Low*, Ex. 1005 at Fig. 3, 2:11-62, 10:1-3, 23-26 (emphasis added).

The Payment Step is the Same Between Alleged Multiple Embodiments in *Low*

"[A]nticipation may still be found by disparate disclosures in the same reference where the reference explicitly contemplates combining those disclosures."

Stryker Corp. v OsteoMed LLC, No. 23-1925, 2025 WL 2814019, at *5 (Fed. Cir. Oct. 3, 2025).

"Where applicable, the ordering of various steps described herein may be changed, combined into composite steps, and/or separated into sub-steps to provide features described herein."

Low, Ex. 1005, 13:60-64.
-027 Reply at 11.

Petitioner is Compliant with *Revvo*

- Petitioner has not offered any claim construction positions in the district court
  - Petitioner has not even answered the counterclaims and the case is stayed

- The only party who has taken inconsistent claim construction positions here and in the district court litigation is **Patent Owner**

- Petitioner showed:
  - (1) Patent Owner's proposed narrowing construction in this proceeding is wrong, because it ignores the claim language and the only embodiment disclosed in the '920 Patent for "completion" of a transaction; **but**
  - (2) if Patent Owner's broader construction in the district court is correct, this is also taught by *Low*.

See Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc., IPR2025-00632, Paper 20 (Director Nov. 3, 2025) (precedential).

Independent Claims 13 and 15

Independent Claims 13 and 15 recite substantially the same limitations as Claim 1 (in both the ’920 and ’423 Patents) and are therefore unpatentable under Sections 102/103 for the same reasons.

Prior Art Grounds: Dependent Claims

The Dependent Claims are Identical Between the Two Patents Except for Claim 11

’920 Patent	’423 Patent
11. The method of claim 1, wherein the user input is a swipe that causes the affordance to be slid.	*11. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, includes:* *a visual representation of the available payment accepting unit;* *an indication of a prepaid balance; and* *an affordance that when slid, indicates the initiation of the transaction;* *wherein the affordance is slid in response to receiving a user input of swipe on the affordance displayed on the display of the mobile device.*

All Dependent Claims are Taught by the Prior Art

Patent	Dependent Claims	Prior Art Invalidity Ground
’423 Patent	2-6, 8, 10, 12, 14, 16-20	*Low*
’423 Patent	7, 9	*Low + Arora*
’920 Patent	2-9, 12, 14, 16-20	*Low + Arora + Freeny*
’920 Patent and ’423 Patent	11	*Low + Arora + Freeny + Casey*

Patent Owner Only Contests Dependent Claims 2-7, 10, 11, and 16-19 of Both Patents

Patent Owner Does Not Contest Dependent Claims 8, 9, 12, 14, and 20 of Both Patents

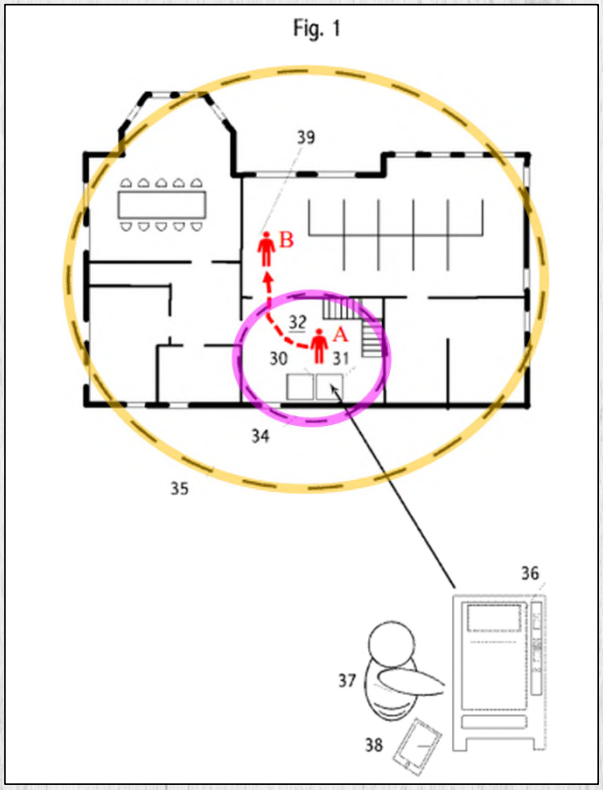
See -027 POR at 35-50; -028 POR at 12-32.

Low in view of *Arora* Teaches Dependent Claim 7 of the '920 and '423 Patents

7. The method of claim 1, wherein the mobile device includes an accelerometer and the method further comprises:
based on data from the accelerometer, determining whether the user is walking away from the available payment accepting unit; and
in accordance with a determination that the user is walking away from the available payment accepting unit, canceling the wireless communication path.

Arora discloses "[d]etermining customer 17 location" through "[i]nertial guidance [which] may use an accelerometer," relative to various distances from a vending machine, including a "within sight" distance 34 and a "potential buyer" distance 35.

Arora, Ex. 1006 at 12:41-13:46 (emphasis added); -027 Pet. at 54-56, -027 Reply at 14-17.



Arora, Ex. 1006 at Figure 1 (annotated).

Low in view of *Arora* Teaches Dependent Claim 7 of the '920 and '423 Patents

"Determining customer 17 location may use one or more technologies, including GPS 11, cellular geolocation 15, LAN identification from access points such as 22 and 20, inertial guidance, vision based location determination, RFID, badge reading (not shown in FIG. 2), NFC 21, manual location entry by the customer, 17, and other technologies."

Arora, Ex. 1006 at 13:28-34 (emphasis added).

185. "Given *Arora*'s prior teachings of determining customer location through inertial guidance, the verification of the message through predetermined bounds such as time and location clearly encompasses determining whether the customer is walking away from the machine. This is further supported by *Arora* specifying that step 90 and the determination of the customer location is based on '[t]ransaction distances [that] are discussed elsewhere, herein."

Neuman Decl., Ex. 1003 at ¶ 185 (emphasis added);
-027 Reply at 15.

Low in view of *Arora* Teaches Dependent Claim 7 of the '920 and '423 Patents

7. The method of claim 1, wherein the mobile device includes an accelerometer and the method further comprises:
based on data from the accelerometer, determining whether the user is walking away from the available payment accepting unit; and
in accordance with a determination that the user is walking away from the available payment accepting unit, canceling the wireless communication path.

"[T]he vending machine could only communicate with the user device at a certain range, further motivating a POSA to **cancel the communication path** between the vending machine and user device if data from the accelerometer indicated that the user was departing or walking toward the limits of the range of near field communication to, among other things, conserve resources by preventing the vending machine 120 of Low from trying to maintain a short range communication link with a user device 110 that is moving away from the vending machine 120."

Neuman Decl., Ex. 1003 at ¶¶ 91-97 (emphasis added); -027 Pet. at 54-56, -027 Reply at 14-17.

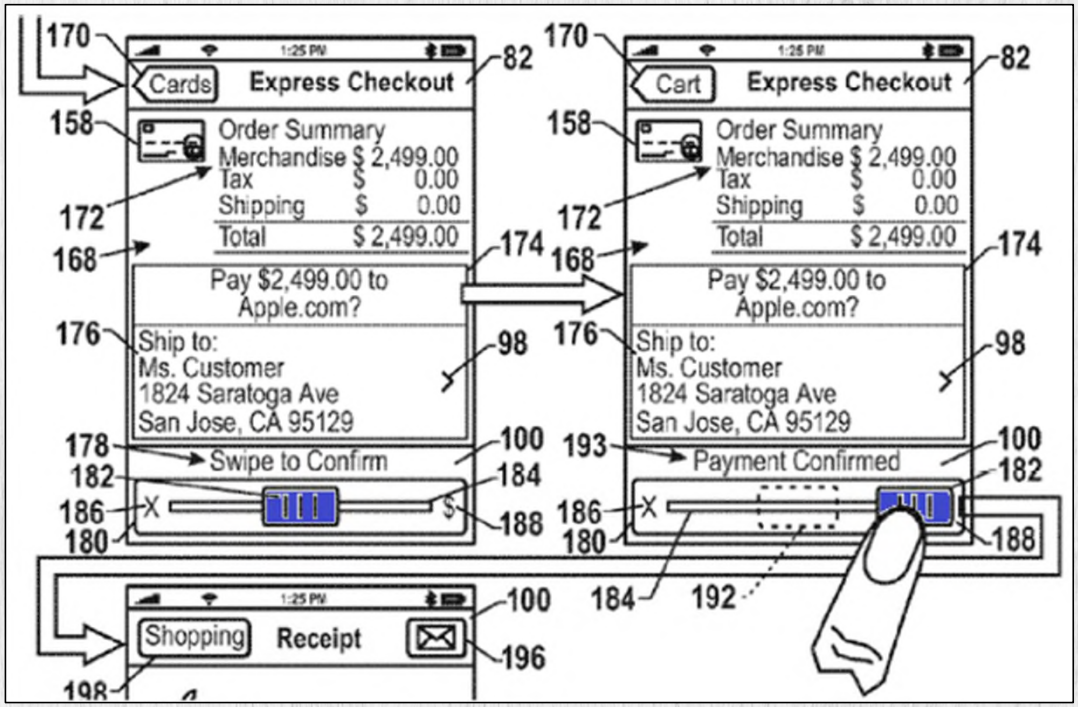
Low in view of *Arora* in Further View of *Freeny* and *Casey* Teaches Dependent Claim 11 of the '920 and '423 Patents

'920 Patent:

11. The method of claim 1, wherein the user input is a swipe that causes the affordance to be slid.

'423 Patent:

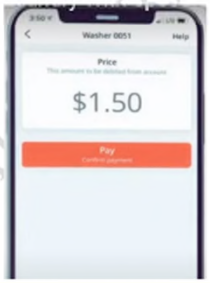
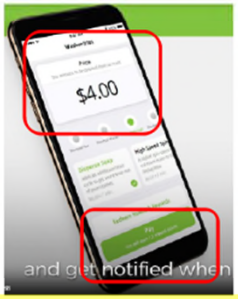
11. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, includes:
a visual representation of the available payment accepting unit;
an indication of a prepaid balance; and
an affordance that when slid, indicates the initiation of the transaction;
wherein the affordance is slid in response to receiving a user input of swipe on the affordance displayed on the display of the mobile device.



Casey, Ex. 1008 at Figure 5 (excerpted/annotated); -027 Pet. at 71-73.

Low in view of *Arora* in Further View of *Freeny* and *Casey* Teaches Dependent Claim 11 of the '920 and '423 Patents

CONFIDENTIAL – SUBJECT TO FRE 408
U.S. Patent Number 11,481,772 – Alliance Claim Infringement Chart

11. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, includes: a visual representation of the available payment accepting unit; an indication of a prepared balance; and an affordance that when slid, indicates the initiation of the transaction; wherein the affordance is slid in response to receiving a user input of swipe on the affordance displayed on the display of the mobile device.	The Speed Queen app and the Huebsch app that is downloaded and installed on a mobile device has a user interface that, after establishing the wireless communication path, includes a visual representation of the available payment accepting unit and an indication of a prepared balance. Specifically, the user interface includes the washer or dryer number identifier and an indication of a balance due. In addition, the Speed Queen app and Huebsch app user interfaces each display a "Pay" button that indicates the initiation of the transaction when pressed. That button performs substantially the same function in substantially the same way to produce substantially the same result as the affordance recited in claim 11. *Crown Packaging Tech., Inc. v. Rexam Beverage Can Co.*, 559 F.3d 1308, 1312 (Fed. Cir. 2009). In addition, the differences between the pressed button and a swiped affordance would be regarded by a POSITA to be insubstantial. *Catalina Marketing International, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 813 (Fed. Cir. 2002). Therefore, the Speed Queen app and Huebsche app infringe that element, at minimum, under the doctrine of equivalents. *See, e.g.*, References 5 and 6.  The Speed Queen app displays a visual representation of the washer or dryer (i.e., "Washer 0051"), an indication of the balance due, and a user option to "Pay" that indicates the initiation of the transaction.  The Huebsch app displays a visual representation of the washer or dryer (i.e., "Washer 0101"), an indication of the balance due, and a user option to "Pay" that indicates the initiation of the transaction.

CONFIDENTIAL – SUBJECT TO FRE 408

Petitioner Exhibit 1017-0014

Patent Owner's
Ex. L to its Counterclaims,
Ex. 1017 at 14.

Low Teaches Dependent Claims 2 and 16 of the '920 and '423 Patents

2. The method of claim 1, wherein the updated user interface of the mobile payment application includes at least one of:
a message displayed on the display of the mobile device;
a banner notification displayed on a display of the mobile device; and/or
a visual alert from one or more light-emitting diodes (LEDs) of the mobile device.

16. The non-transitory computer readable storage medium of claim 15, wherein the updated user interface of the mobile payment application includes at least one of:
a message displayed on the display of the mobile device;
a banner notification displayed on a display of the mobile device; and/or
a visual alert from one or more light-emitting diodes (LEDs) of the mobile device.

"[T]he payment provider…may send product details to the user device to upsell or advertise products," including "displaying a message to user 102 after purchasing a drink such as, 'Would you like chips with your drink.'"

Low, Ex. 1005 at 2:20–23, 7:35–39 (emphasis added); -027 Pet. at 49-50.

Low Teaches Dependent Claim 3 of the '920 and '423 Patents

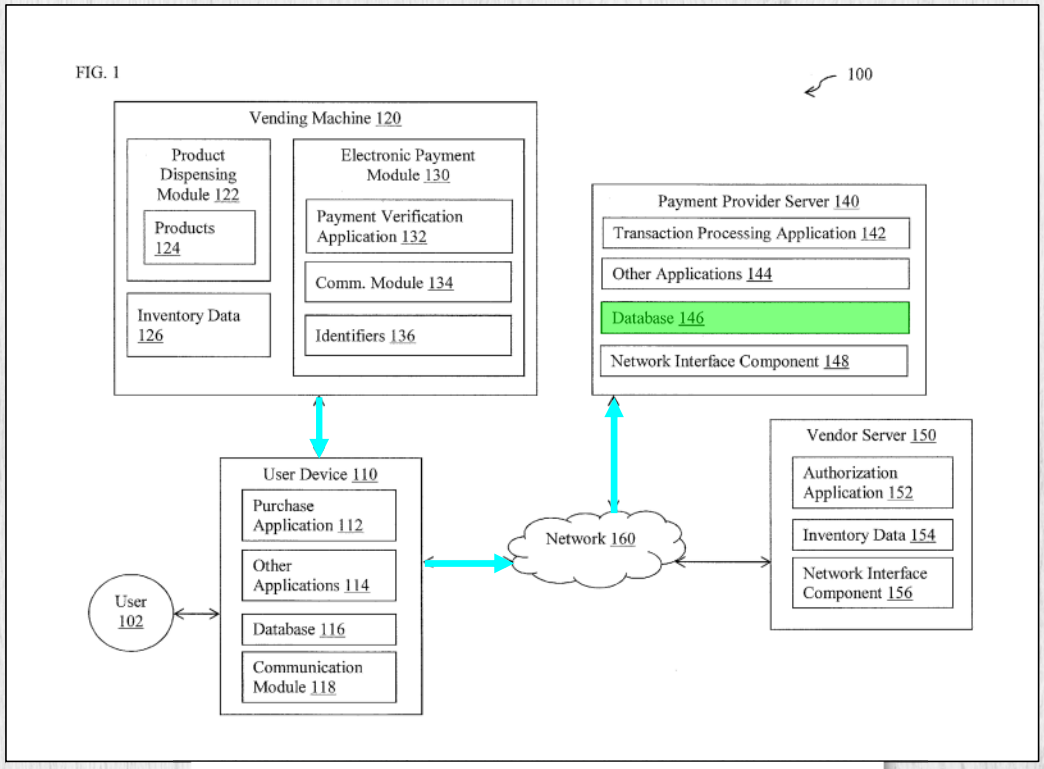
3. The method of claim 1, wherein the information [exchanged with the available payment accepting unit] indicates completion of the transaction between the user of the mobile device and the available payment accepting unit.

Payment provider server 140 includes a database 146, which "include[s] information associated with the transaction history processing" described in *Low.*

Low (Ex. 1005) at 7:22–24 (emphasis added).

"Vending machine [1]20 does not communicate with payment provider server [1]40 directly, but communicates through user device [1]10."

Dr. Jeffrey Miller Dep. Tr. (Ex. 1032) at 129:7-9.



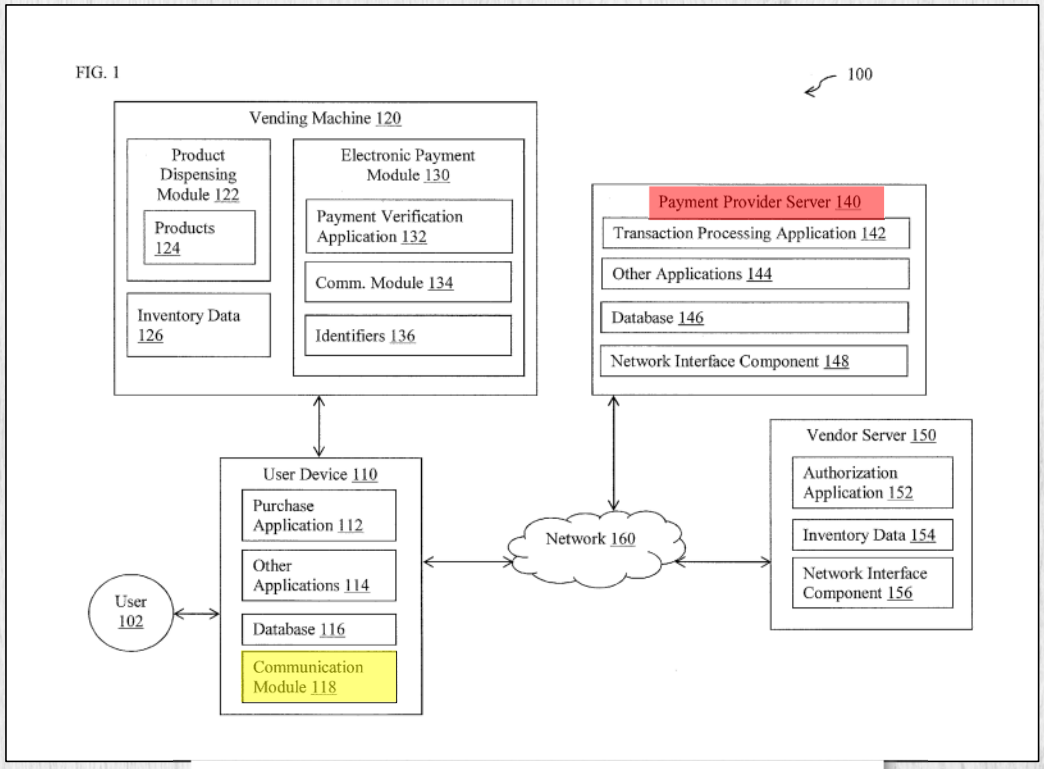
Low, Ex. 1005 at Figure 1 (annotated); -027 Reply at 13.

Low Teaches Dependent Claim 4 of the '920 and '423 Patents

4. The method of claim 3, wherein the mobile device includes a long-range transceiver and the information [exchanged with the available payment accepting unit] at least includes an amount of the completed transaction, and the method further comprises: sending at least the amount of the completed transaction to a server via the long-range transceiver.

User device 110 includes a communication module 118, which "may include a DSL (e.g., Digital Subscriber Line) modem, a PSTN (Public Switched Telephone Network) modem, an Ethernet device, a broadband device, a satellite device and/or various other types of wired and/or wireless network communication devices." *Low* (Ex. 1005) at 4:48-54.

User device 110 transmits to payment provider server 140 "a purchase request including…***product price***." *Id.* at 6:3-8 (emphasis added).



Low, Ex. 1005 at Figure 1 (annotated); -027 Pet. at 51.

Demonstrative Exhibit - Not Evidence

Low Teaches Dependent Claim 17 of the '920 and '423 Patents

17. The non-transitory computer readable storage medium of claim 15, wherein: the information [exchanged with the available payment accepting unit] indicates completion of the transaction between the user of the mobile device and the available payment accepting unit; the information at least includes an amount of the completed transaction; and the instructions further cause the mobile device to send at least the amount of the completed transaction to a server.

Payment provider server 140 includes a database 146, which "include[s] information associated with the transaction history processing" described in *Low*.

Low, Ex. 1005 at 7:22–24 (emphasis added).

"Vending machine [1]20 does not communicate with payment provider server [1]40 directly, but communicates through user device [1]10."

Miller Dep. Tr., Ex. 1032 at 129:7-9.

User device 110 includes a communication module 118, which "may include a DSL (e.g., Digital Subscriber Line) modem, a PSTN (Public Switched Telephone Network) modem, an Ethernet device, a broadband device, a satellite device and/or various other types of wired and/or wireless network communication devices." *Low*, Ex. 1005 at 4:48-54.

User device 110 transmits to payment provider server 140 "a purchase request including…***product price***." *Id*. at 6:3-8 (emphasis added).

Demonstrative Exhibit - Not Evidence

Low Teaches Dependent Claims 5 and 18 of the '920 and '423 Patents

5. The method of claim 1, wherein the information [exchanged with the available payment accepting unit] indicates abortion of the transaction initiated by the user of the mobile device.

"[T]he user device transmits the purchase request to a server for approval," which "may determine if there are any restrictions and/or limitations corresponding to the user account and may take appropriate actions as desired."

Low, Ex. 1005 at 10:41–54 (emphasis added); -027 Pet. at 52.

18. The non-transitory computer readable storage medium of claim 15, wherein the information [exchanged with the available payment accepting unit] indicates abortion of the transaction initiated by the user of the mobile device.

"In my opinion, Low's disclosure of a server determining whether there are any restrictions and/or limitations, including whether there are adequate funds for the transaction, encompasses a scenario where the transaction is aborted (e.g., because of a restriction and/or limitation on the user account or inadequate funds)."

Neuman Decl., Ex. 1003 at ¶¶ 170-174.

Low Teaches Dependent Claims 6 and 19 of the '920 and '423 Patents

6. The method of claim 1, wherein the information [exchanged with the available payment accepting unit] indicates failure of the transaction initiated by the user of the mobile device or a malfunction associated with the available payment accepting unit.

19. The non-transitory computer readable storage medium of claim 15, wherein the information [exchanged with the available payment accepting unit] indicates failure of the transaction initiated by the user of the mobile device or a malfunction associated with the available payment accepting unit.

"[T]he user device transmits the purchase request to a server for approval," which "may determine if there are any restrictions and/or limitations corresponding to the user account and may take appropriate actions as desired."

Low, Ex. 1005 at 10:41–54 (emphasis added); -027 Pet. at 53.

"In my opinion, Low's disclosure of a server determining whether there are any restrictions and/or limitations, including whether there are adequate funds for the transaction, encompasses a scenario where the transaction fails (e.g., because of a restriction and/or limitation on the user account or inadequate funds). "

Neuman Decl., Ex. 1003 at ¶¶ 176-179.

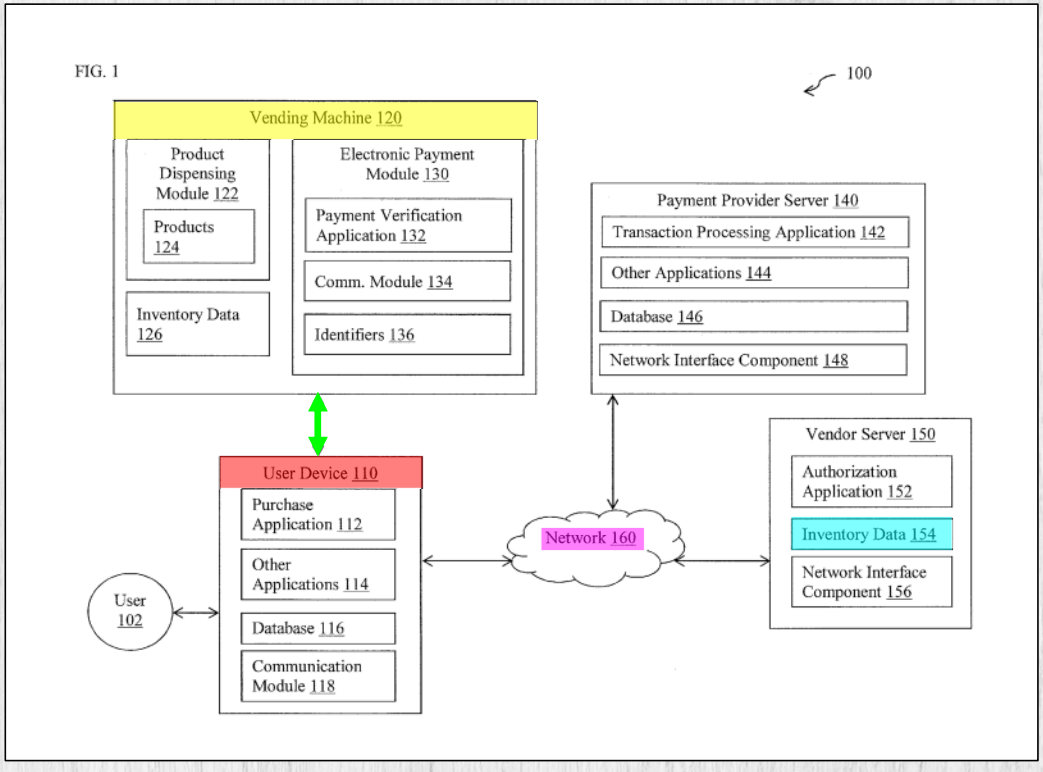
Demonstrative Exhibit - Not Evidence

Low Teaches Dependent Claim 10 of the '920 and '423 Patents

10. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, indicates that the wireless communication path has been established with the available payment accepting unit.

"Inventory data 154 may be received from vending machine 120, for example using an Internet connection of user device 110 after a short-range communication link is established between user device 110 and vending machine 120," and the inventory data "may be utilized with user device 110 to display to user 102."

Low, Ex. 1005 at 8:24–28, 5:41–42 (emphasis added); -027 Pet. at 59, -027 Reply at 17.



Low, Ex. 1005 at Figure 1 (annotated).

Patent Eligibility Grounds: All Claims

All Claims Are Ineligible Under Section 101

- Patent Owner Should Be Collaterally Estopped from Arguing That Claims 1-6, 8-10, 13, and 15-19 of Both Patents are Not Invalid Under § 101
  - The Board previously found most of the Challenged Claims of the related ’614 Patent invalid under Section 101
- Even if the Board Does Not Apply Collateral Estoppel, the Challenged Claims are Invalid Under § 101
  - The Challenged Claims are directed to the abstract idea of identifying a merchant and enabling completion of a purchase from the merchant, which can be performed by a human in the mind or via oral or written communication with a merchant.

Collateral Estoppel Applies

Collateral estoppel applies where:

1. the issue is identical to one decided in the first action;
2. the issue was actually litigated in the first action;
3. resolution of the issue was essential to a final judgment in the first action; and
4. the party against whom collateral estoppel is being asserted had a full and fair opportunity to litigate the issue in the first action.

Google LLC v. Hammond Dev. Int'l, Inc., 54 F.4th 1377, 1381 (Fed. Cir. 2022).

"[C]ollateral estoppel may apply even if the patent claims 'use slightly different language to describe substantially the same invention,' so long as 'the differences…do not materially alter the question of invalidity.'" *Id*. (emphasis added).

See -027 Pet. at 74.

Patent Owner Disputes Only Two Limitations Regarding Materiality Between Claims 1 of the '920 Patent and the '614 Patent

'614 Patent, Claim 1	'920 Patent, Claim 1
identifying one or more payment accepting units …including ***detecting predefined radio messages broadcast by*** *the one or more payment accepting units*	*[1.2] identifying one or more payment accepting units…[1.3]* ***based at least in part on an identifier or location corresponding to*** *the one or more payment accepting units*
displaying a user interface of the mobile payment application on the display of the mobile device	*[1.10] wherein the user interface includes a visual representation of the available payment accepting unit, [1.11] an indication of a balance, and [1.12] an affordance that, in response to a user input, indicates completion of the transaction*

See -027 POR at 53-56.

The Affordance Being "Slid" in Claim 11 of the '614 Patent is Absent from Claim 1 of the '920 Patent

'614 Patent, Claim 11	'920 Patent, Claim 1
wherein the user interface of the mobile payment application presented after establishing via the wireless connection includes: *a visual representation of available payment accepting unit;* *an indication of a prepared balance; and* *an affordance that when slid, indicates the initiation of the vending transaction*	*wherein the user interface ~~of the mobile payment application presented after establishing via the wireless connection~~ includes~~:~~ a visual representation of the available payment accepting unit~~;~~, an indication of a ~~prepared~~ balance~~;~~, and an affordance that ~~when slid~~, in response to a user input, indicates ~~the initiation~~ completion of the ~~vending~~ transaction*

See Ex. 1011; -027 Reply at 20.

Patent Owner Disputes Only One Limitation Regarding Materiality Between Claims 1 of the '423 Patent and the '614 Patent

'614 Patent, Claim 1	'423 Patent, Claim 1
identifying one or more payment accepting units …including ***detecting predefined radio messages broadcast by*** *the one or more payment accepting units*	*identifying one or more payment accepting units…****based at least in part on an identifier or location corresponding to*** *the one or more payment accepting units*

See Ex. 1011; -028 Reply at 14.

The Examiner Concluded the Claims Were Materially Identical

The Examiner of both the ’920 and ’423 Patents issued an obviousness-type double patenting rejection against all pending claims of each patent in view of the ’614 Patent, concluding:

> “the conflicting claims…are not patentably distinct from each other” and the only difference between the claims was a “labeling difference.”
>
> “It is noted that all features of claims 1-20 are contained in claims 1-25 of the ’614 patent.”

-027, Ex. 1002 at 150 (emphasis added); -028, Ex. 1002 at 151-52; -027 Reply at 20.

Even Absent Collateral Estoppel, the Claims Are Ineligible Under § 101

Step 1 of the test for patent-eligibility addresses whether the claimed invention falls into at least one of the four categories of patentable subject matter recited in 35 U.S.C. § 101. *See* MPEP § 2106.03; 2024 Guidance Update on Patent Subject Matter Eligibility, 89 Fed. Reg. 137 (July 17, 2024) ("2024 Guidance").

Step 2 applies the Supreme Court's two-part framework described in *Mayo Collaborative Servs. v. Prometheus Labs., Inc.*, 566 U.S. 66 (2012) and *Alice Corp. v. CLS Bank Int'l*, 573 U.S. 208 (2014). *See id.*; MPEP § 2106.04.

Claim 1, Step 1

Claim 1 of each patent requires *"[a] method of presenting representations of payment accepting unit events,"* which falls within the process category of Section 101.

The analysis then proceeds to Step 2A.

The Claims Merely Implement Conventional Techniques on a Generic Mobile Device

"The claims amount to nothing more than applying the above-identified abstract idea using techniques that are, whether considered individually or as an ordered combination, well-understood, routine, and conventional. The claims apply the abstract idea on a computer by replacing the human intermediary with a GUI and API, but as the Board concluded, representative claim 1 'merely recites generic and conventional computer components (i.e., 'processor,' 'GUI,' and 'API') and functionality for carrying out' the abstract idea. Decision, at 47. And the 'communication of information by GUIs and APIs' was well-known in the prior art."

cxLoyalty, Inc. v. Maritz Holdings Inc., 986 F.3d 1367, 1377 (Fed. Cir. 2021) (emphasis added); -027 Pet. at 81, 99; -027 Reply at 22-23.

Claim 1, Step 2A, Prong One

Claim 1 is directed to the abstract idea of identifying a merchant and enabling completion of a purchase from the merchant, which can be performed by a human in the mind or via oral, or written communication with a merchant.

Federal Circuit has held similar claims ineligible:

- *Universal Secure Registry LLC v. Apple Inc.*, 10 F.4th 1342, 1349 (Fed. Cir. 2021): enabling transaction using time-varying code;
- *In re AuthWallet, LLC*, 2022-1842, 2023 WL 3330298, at *3 (Fed. Cir. May 10, 2023): authorizing transaction requests and applying discounts and benefits to transaction.

-027 Pet. at 80-84

Patent Owner Tries to Read in Features from the Specification

Patent Owner focuses on the disclosure of two different modes, a "hands-free mode" and a "manual mode," but these are disclosed only in the specification, not the claims.

See -027 POR at 64-68; -028 POR at 42-46.

The Board rejected Patent Owner's same arguments in the '614 Patent PGR. *See, e.g.*, PGR2021-00093, Paper 38 at 31-32 n.12 ("Patent Owner agrees that the disclosed 'hands-free' mode is not claimed. Tr. 44:24-45:6.") (emphasis added); *see also id*. at 27 n.11, 29, 33.

"It is the subject matter of the claims, not embodiments disclosed in the '920 patent specification, that we analyze."

-027, Inst. Dec., Paper 12 at 27
(citing *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759, 769 (Fed. Cir. 2019)).

Claim 1 of the ’920 and ’423 Patents, Step 2A, Prong Two

- Mobile device
- Processors
- Memory
- Output devices including a display
- Radio transceivers
- Payment accepting units
- User interface
- Wireless communication path

In the ’614 Patent PGR, the Board found that similar elements were “merely used as a tool to perform an abstract idea on computers and do not integrate the [judicial] exception into a practical application, and claim 1 does not require [] technical solutions.”

PGR2021-00093, Final Written Decision, Paper 38, at 35; -027 Pet. at 84-85.

Claim 1, Step 2B

Patent Owner's expert, Dr. Miller, acknowledged that each of the hardware elements recited in Claim 1 were known prior to the patents. *See* Miller Dep. Tr., Ex. 1032 at 140:18-151:18.

- "processors existed in 2013." *Id*. at 142:8.
- "memory existed as of 2013." *Id*. at 142:12-13.
- "displays existed in 2013." *Id*. at 142:17.
- "radio transceivers existed in 2013." *Id*. at 142:21-22

Dr. Miller also acknowledged that each recited step is a function performed by a generic mobile device. *Id*.

The specification describes that each of these functions is performed using known, generic technology, such as an iPhone 5.

-027, Ex. 1001 at 21:3;
-027 Reply at 18-19.

Independent Claims 13 and 15

Independent Claims 13 and 15 recite substantially the same limitations as Claim 1 and are therefore ineligible under Section 101 for the same reasons.

Dependent Claims

Patent Owner only contests the ineligibility of dependent Claims 2-7, 10, and 16-19 of the ’920 Patent and 2-7, 10-11, and 16-19 of the ’423 Patent

Accordingly, dependent Claims 8, 9, 11-12, 14, and 20 of the ’920 Patent, and dependent claims 8-9, 12, 14, and 20 of the ’423 Patent, remain uncontested and should be found ineligible

Dependent Claims 2, 3, and 16 of the ’920 and ’423 Patents

2. The method of claim 1, wherein the updated user interface of the mobile payment application includes at least one of:
a message displayed on the display of the mobile device;
a banner notification displayed on a display of the mobile device; and/or
a visual alert from one or more light-emitting diodes (LEDs) of the mobile device.

3. The method of claim 1, wherein the information indicates completion of the transaction between the user of the mobile device and the available payment accepting unit.

16. The non-transitory computer readable storage medium of claim 15, wherein the updated user interface of the mobile payment application includes at least one of:
a message displayed on the display of the mobile device;
a banner notification displayed on a display of the mobile device; and/or
a visual alert from one or more light-emitting diodes (LEDs) of the mobile device.

Claims 2, 3, and 16 do not provide additional information regarding the claimed messages, notifications, or visual alerts, beyond that “appropriate technology may be used” and providing generic sample notifications and messages.

’920 Patent, Ex. 1001 at 13:46-49; -027 Pet. at 88-92.

Demonstrative Exhibit - Not Evidence

Dependent Claims 4-6, 10, and 17-19 Are Nearly Identical to Similar Claims of the ’614 Patent Already Found Ineligible

The Board already analyzed nearly identical claims in the ’614 Patent PGR and concluded that the additional limitations of these dependent claims did not add “meaningful limitations to the judicial exception and that the claimed subject matter of each of those claims is patent ineligible.”

See -027 Pet. at 88*;* PGR2021-00093, Paper 38 at 45-46 (Dec. 2022); *see also* Ex. 1011 (redline claim comparisons).

Dependent Claim 7 of the ’920 and ’423 Patents

7. The method of claim 1, wherein the mobile device includes an accelerometer and the method further comprises:
based on data from the accelerometer, determining whether the user is walking away from the available payment accepting unit; and
in accordance with a determination that the user is walking away from the available payment accepting unit, canceling the wireless communication path.

See PGR2021-00093, Paper 38 at 45-46 (Dec. 2022).

Generic accelerometers are well-known and present in the iPhone 5 described in the specification.

-027, Ex. 1001 at 21:3

Cancelling a connection based on data from an accelerometer that a user is walking away from the available payment accepting unit was so routine that it was within the knowledge of a POSA at the time of the patents, as explained by Dr. Neuman.

-027, Ex. 1003 at ¶¶ 330-33.

-027 Petition at 92-93; -027 Reply at 21

Dependent Claim 11 of the ‘423 Patent

11. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, includes:
a visual representation of the available payment accepting unit;
an indication of a prepaid balance; and
an affordance that when slid, indicates the initiation of the transaction;
wherein the affordance is slid in response to receiving a user input of swipe on the affordance displayed on the display of the mobile device.

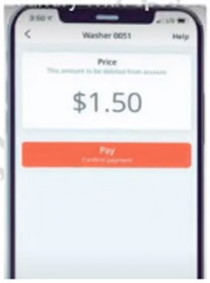
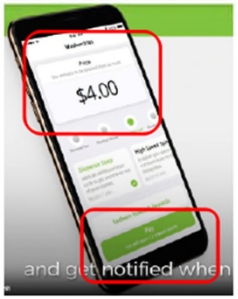
Communicating generic transaction information (an available unit, an indication of a balance, and an indication of transaction initiation) using a well-known, generic and conventional “user interface.”

“Swiping” is not inventive. *Linfo IP, LLC v. TrustPilot, Inc.*, 24-cv-2796, slip op., Dkt. 37 (S.D.N.Y. Jan. 3, 2025) (enabling interaction with a user interface via a slider is a basic computer function)

-027 Pet. at 93.

Dependent Claim 11 of the ’423 Patent

CONFIDENTIAL – SUBJECT TO FRE 408
U.S. Patent Number 11,481,772 – Alliance Claim Infringement Chart

11. The method of claim 1, wherein the user interface of the mobile payment application, after establishing the wireless communication path, includes: a visual representation of the available payment accepting unit; an indication of a prepared balance; and an affordance that when slid, indicates the initiation of the transaction; wherein the affordance is slid in response to receiving a user input of swipe on the affordance displayed on the display of the mobile device.	The Speed Queen app and the Huebsch app that is downloaded and installed on a mobile device has a user interface that, after establishing the wireless communication path, includes a visual representation of the available payment accepting unit and an indication of a prepared balance. Specifically, the user interface includes the washer or dryer number identifier and an indication of a balance due. In addition, the Speed Queen app and Huebsch app user interfaces each display a “Pay” button that indicates the initiation of the transaction when pressed. That button performs substantially the same function in substantially the same way to produce substantially the same result as the affordance recited in claim 11. *Crown Packaging Tech., Inc. v. Rexam Beverage Can Co.*, 559 F.3d 1308, 1312 (Fed. Cir. 2009). In addition, the differences between the pressed button and a swiped affordance would be regarded by a POSITA to be insubstantial. *Catalina Marketing International, Inc. v. Coolsavings.com, Inc.*, 289 F.3d 801, 813 (Fed. Cir. 2002). Therefore, the Speed Queen app and Huebsche app infringe that element, at minimum, under the doctrine of equivalents. *See, e.g.*, References 5 and 6.  The Speed Queen app displays a visual representation of the washer or dryer (i.e., “Washer 0051”), an indication of the balance due, and a user option to “Pay” that indicates the initiation of the transaction.  The Huebsch app displays a visual representation of the washer or dryer (i.e., “Washer 0101”), an indication of the balance due, and a user option to “Pay” that indicates the initiation of the transaction.

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Petitioner Exhibit 1017-0014

Patent Owner’s
Ex. L to its Counterclaims,
Ex. 1017 at 14.

Thank You