

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,**

Petitioners,

v.

ICASHE, INC.,

Patent Owner.

Case IPR2025-00639

U.S. Patent No. 9,122,965

**DECLARATION OF CHERYL SLOANE
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S.
PATENT NO. 9,122,965**

1. I, Cheryl Sloane, make the following Declaration pursuant to 28 U.S.C. § 1746: I am the IP Paralegal Manager at the law firm of Ropes & Gray LLP.
2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office (“USPTO”). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.
3. Ex. 1001 is a true and correct copy of U.S. Patent No. 9,122,965 (“’965”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.
4. Ex. 1002 is a true and correct copy of File History of File History of U.S. Application No. 14/517,495 (“’965FH”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.
5. Ex. 1004 is a true and correct copy of U.S. Patent App. Pub. No. 2010/0112941 (“Bangs”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers

on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1005 is a true and correct copy of U.S. Patent App. Pub. No. 2009/0040022 (“Finkenzeller”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1006 is a true and correct copy of U.S. Patent App. Pub. No. 2009/0215489 (“Kerdraon”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 1007 is a true and correct copy of U.S. Patent App. Pub. No. 2008/0073426 (“Koh”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 1009 is a true and correct copy of File History for U.S. Patent Application No. 12/188,346 (“346 Application File History”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an

exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1011 is a true and correct copy of File History for U.S. Patent No. 9,483,722 (“722 File History”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1015 is a true and correct copy of Dachs, C., NFC — the intuitive contactless technology becomes reality, 122 E&I Elektrotechnik und Informationstechnik 466 (Dec. 1, 2005) (“Dachs”), which was obtained from <https://link.springer.com/article/10.1007/BF03054380>. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1016 is a true and correct copy of U.S. Patent No. 9,483,722 (“722”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1017 is a true and correct copy of U.S. Patent App. Pub. No. 2005/0224589 (“Park”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1018 is a true and correct copy of U.S. Patent No. 8,260,199 (“Kowalski”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

15. Ex. 1019 is a true and correct copy of U.S. Patent No. 6,282,407 (“Vega”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

16. Ex. 1020 is a true and correct copy of U.S. Patent App. Pub. No. 2008/0186166 (“Zhou”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

17. Ex. 1021 is a true and correct copy of U.S. Patent App. Pub. No. 2007/0035396 (“Chand”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

18. Ex. 1022 is a true and correct copy of U.S. Patent App. Pub. No. 2008/0163361 (“Davis”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

19. Ex. 1023 is a true and correct copy of U.S. Patent No. 5,943,624 (“Fox”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

20. Ex. 1026 is a true and correct copy of U.S. Patent App. Pub. No. 2008/0235796 (“Buhr”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

21. Ex. 1031 is a true and correct copy of U.S. Patent App. Pub. No. 2004/0133787 (“Doughty”), which was obtained from the USPTO’s Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

22. Ex. 1036 is a true and correct copy of Mayes, K. et al., Smart Cards, Tokens, Security and Applications (December 11, 2007), which was obtained from <https://link.springer.com/book/10.1007/978-0-387-72198-9>. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

23. Ex. 1050 is a true and correct copy of the October 4, 2024 Docket Control Order (Dkt. No. 30), entered in *iCashe, Inc. v. Samsung Electronics Co.*, No. 2:24-cv-00429-JRG (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

24. Ex. 1051 is a true and correct copy of the September 3, 2024 Docket Control Order (Dkt. No. 60) entered in *Valtrus Innovations Ltd. v. NTT Data Services, LLC*, No. 2:24-cv-00361, (E.D. Tex.), which was obtained from PACER

at my direction. In addition to the lead case against NTT Data Services LLC, the Docket Control Order in Ex. 1051 also includes the case schedule for the following member cases that have been consolidated solely for pretrial purposes: *Valtrus Innovations Ltd. v. CyrusOne, LLC*, No. 2:24-cv-00259-JRG; *Valtrus Innovations Ltd. v. Digital Realty Trust, Inc.*, No. 2:24-cv-00139-JRG; *Valtrus Innovations Ltd. v. CyrusOne, LLC*, No. 2:24-cv-00534-JRG; and *Valtrus Innovations Ltd. v. Digital Realty Trust, Inc.*, No. 2:24-cv-00535-JRG (E.D. Tex.). This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

25. Ex. 1052 is a true and correct copy of the October 2, 2024 Docket Control Order (Dkt. No. 20), entered in *Fleet Connect Solutions LLC v. The Kroger Co.*, No. 2:24-cv-00430 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

26. Ex. 1053 is a true and correct copy of the December 23, 2024 Docket Control Order (Dkt. No. 20), entered in *C47 Technologies LLC v. TCL Technology Group Corporation f/k/a TCL Corporation*, No. 2:24-cv-00417 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with

an exhibit label and page numbers on each page at the bottom right corner.

However, no alterations, other than these noted markings, have been made to this document.

27. Ex. 1054 is a true and correct copy of the October 10, 2024 Docket Control Order (Dkt. No. 32), entered in *SiOnyx, LLC v. Samsung Electronics, Co., Ltd.*, No. 2:24-cv-00408 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

28. Ex. 1055 is a true and correct copy of the October 17, 2024 Docket Control Order Control Order (Dkt No. 33), entered in *Stingray IP Solutions LLC v. Allegion Public Limited Company*, No. 2:24-cv-00396 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

29. Ex. 1056 is a true and correct copy of the November 22, 2024, Docket Control Order (Dkt. No. 18), entered in *ElectraLED, Inc. v. Astera LED Technology GmbH*, No. 2:24-cv-00512 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and

page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

30. Ex. 1057 is a true and correct copy of the November 22, 2024, Docket Control Order (Dkt. No. 22), entered in *Alto Dynamics, LLC v. Fresha.com SV Ltd.*, 2:24-cv-00468 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

31. Ex. 1058 is a true and correct copy of the November 27, 2024 Docket Control Order (Dkt. No. 33), entered in *Cloud Byte LLC v. Dell Inc.*, No. 2:24-cv-00637 (E.D. Tex.), which was obtained from PACER at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

32. Ex. 1059 is a true and correct copy of the September 20, 2024 production letter received by email from counsel for iCashe in the district court litigation. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

33. Ex. 1060 is a true and correct copy of the December 12, 2024 production letter received by email from counsel for iCashe in the district court litigation. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

34. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

35. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

36. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of March, 2025, in Boston, Massachusetts.

/Cheryl Sloane/
Cheryl Sloane
ROPES & GRAY