

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

Asserted claims 1-18 of U.S. Patent No. 11,770,756 (“the ’756 patent”) are patent-ineligible under 35 U.S.C. § 101. They are directed to an abstract idea, namely, the abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically enabling functions after determining a criteria is met. *Alice Corp. v. CLS Bank Int’l*, 573 U.S. 208, 218-24 (2014).

Samsung contends that claim 1 of the ’756 patent is representative of the other asserted claims of the ’756 patent. Every independent claim of the ’756 patent is directed to the same abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically enabling functions after determining a criteria is met, and recites substantially the same generic, conventional steps and elements for doing so. The only disclosure of any hardware in the claims are references to the same generic “smartphone,” and the steps performed by that hardware consist of the same generic data “sending” and “determining” steps and the claimed controlling (including “enabling”) that are part of the abstract idea at issue. The remaining elements of the independent and dependent claims do not add anything beyond abstract ideas, generic implementation details, or insignificant pre- or post-solution activity relative to claim 1 of the ’756 patent, such enabling functions based also on authorization and/or proximity (themselves abstract ideas), that the function relates to conducting a financial transaction (also abstract), and reciting generic wireless technologies used to implement these abstract ideas.

Alternatively, Samsung contends that claim 1 of the ’411 patent is representative of all asserted claims of the Asserted Patents, including the ’756 patent. Claim 1 of the ’411 patent, like the claims of the ’756 patent, is directed to controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically enabling functions after determining a criteria is met. First, as discussed above, claim 1 of the ’756 patent is representative of the other asserted claims of the ’756 patent. Second, claim 1 of the ’756 patent does not add anything beyond more abstract ideas, generic implementation details, or insignificant pre- or post-solution activity relative to claim 1 of the ’411 patent. Indeed, claim 1 of the ’411 patent includes additional generic implementation details, or insignificant pre- or post-solution activity not found in claim 1 of the ’756 patent. Thus, if claim 1 of the ’411 patent is found invalid, then claim 1 of the ’756 patent is also invalid.

Alternatively, Samsung contends that claim 1 of the ’172 patent is representative of all asserted claims of the Asserted Patents, including the ’756 patent. Claim 1 of the ’172 patent, like the claims of the ’756 patent, is directed to controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically transmitting information after determining an entity is present and passes a biometric check. First, as discussed above, claim 1 of the ’756 patent is representative of the other asserted claims of the ’756 patent. Second, claim 1 of the ’756 patent does not add anything relative to claim 1 of the ’712 patent. Indeed, claim 1 of the ’712 patent includes additional generic implementation details, or insignificant pre- or post-solution activity not found in claim 1 of the ’756 patent. Thus, if claim 1 of the ’712 patent is found invalid, then claim 1 of the ’756 patent is also invalid.

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

Nevertheless, Samsung has addressed each claim and element of the '756 patent in the charts below individually.

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

Claim	U.S. Patent No. 11,770,756	Section 101 Analysis
[1.1]	A method of operating a device, the method comprising:	<p><u>Alice Step One</u></p> <p>As a preliminary matter, because the abstract idea inquiry at <i>Alice</i> Step One and the inventive concept inquiry at <i>Alice</i> Step Two often overlap—particularly concerning the existence of a specific technological improvement, any applicable legal or factual analysis provided in the step 2 section below is herein incorporated into the step 1 section, and vice versa. <i>See e.g. Ancora Techs. v. HTC Am., Inc.</i>, 908 F.3d 1343, 1349 (Fed. Cir. 2018); <i>Elec. Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1353 (Fed. Cir. 2016).</p> <p>Considered as a whole, the asserted claims of the '756 patent, including claim 1, are directed to the abstract idea of controlling whether to transmit data based on collecting and assessing information as criteria, and more specifically enabling functions after determining a criteria is met. <i>Internet Patents Corp. v. Active Network, Inc.</i>, 790 F.3d 1343, 1346 (Fed. Cir. 2015) (“Under step one of Mayo/Alice, the claims are considered in their entirety to ascertain whether their character as a</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>whole is directed to excluded subject matter.”); <i>Genetic Techs.</i>, 818 F.3d at 1375-76 (inquiry at Step 1 looks at “the focus of the claimed advance over the prior art.”) <i>See also e.g. Univ. of Fla. Research Found., Inc. v. GE Co.</i>, 916 F.3d 1363, 1368 (Fed. Cir. 2019) (confirming that “collecting, analyzing, manipulating, and displaying data” is an abstract idea); <i>Perfect Web Techs., Inc. v. Infousa, Inc.</i>, No. 07-80286-CIV, 2008 WL 6153736, at *10 (S.D. Fla. Oct. 27, 2008) (“[T]he Federal Circuit has held that a process that combines algorithms is no more patentable than any of the algorithms standing alone.”) <i>In re TLI Communications LLC</i>, 828 F.3d 607, 612 (Fed. Cir. 2016); <i>Zkey Inv., LLC v. Facebook Inc.</i>, 2016 WL 7046593, at *5 (C.D. Cal. Dec. 2, 2016); <i>Modern Telecom Systems LLC v. Lenovo (United States) Inc.</i>, 2015 WL 7776873, at *9 (C.D. Cal. Dec. 2, 2015) (Carter, J.) (claims directed to “communicating data and mathematical calculations through communications channels . . . are directed to abstract ideas”).</p> <p>The focus of the asserted claims of the ’756 patent is on the abstract idea is confirmed by the claim language itself as well as at least the following disclosures in the patent abstract, specification, and claims, and/or admissions by Telcom:</p> <ul style="list-style-type: none"> • “Mobile device mode enablement responsive to a proximity criterion” (’756 patent at Title) • “A system (10) and method (30) comprises a detector that is configured to enable a mode of a first device (14) and/or to enable a mode of a second device (15) responsive to a detection that a proximity criterion is satisfied between the first device and an entity (Entity 1) and responsive to at least one of a position, velocity and a Time-of-Day and where the second device is not the entity and is not associated with the entity, and where the entity is not involved in providing a communications service to the first and/or second device.” (’756 patent at Abstract) • “This invention relates to systems, devices and/or methods that may be used to provide an adaptive enablement of one or more communications modes based upon having satisfied a proximity criterion.” (’756 patent at 1:30-33) • “The present invention, addresses these limitations (i.e., the rigidity) of current wireless mobile devices. Accordingly, embodiments of the present invention provide systems, devices and/or methods that may be used to enable
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>adaptively one or more modes/functions of a device based upon having satisfied by the device (or another device) a proximity condition/criterion.” (’756 patent at 1:53-59)</p> <ul style="list-style-type: none">• “As used herein, the term ‘end-user device,’ ‘wireless mobile device,’ ‘mobile wireless device’ or simply ‘device’ includes any electronic device that may be used to transmit/receive information wirelessly and/or non-wirelessly such as, for example, a Digital Subscriber Line (DSL) modem/transceiver; a cable modem/transceiver; a cellular and/or satellite radiotelephone with or without a multi-line display; Personal Communications System (PCS) terminals that may combine a radiotelephone with data processing, facsimile and/or data communications capabilities; Personal Digital Assistants (PDA) that can include a radio frequency transceiver and/or a pager, Internet/Intranet access, Web browser, organizer, calendar and/or a global positioning system (GPS) receiver; laptop and/or palmtop computers or other appliances, which may (or may not) include a radio frequency transceiver.” (’756 patent at 1:60-2:8)• “This invention may, however, be embodied in many different forms and should not be construed as limited to the embodiments set forth herein. Rather, these embodiments are provided so that this disclosure will be thorough and complete, and will fully convey the scope of the invention to those skilled in the art.” (’756 patent at 2:38-43)• “The terminology used herein is for the purpose of describing particular embodiments only and is not intended to be limiting of the invention.” (’756 patent at 2:50-53)• “Unless otherwise defined, all terms (including technical and scientific terms) used herein have the same meaning as commonly understood by one of ordinary skill in the art to which this invention belongs. It will be further understood that terms, such as those defined in commonly used dictionaries, should be interpreted as having a meaning that is consistent with their meaning in the context of the relevant art and the present disclosure, and will not be interpreted in an idealized or overly formal sense unless expressly so defined herein.” (’756 patent at 2:62-3:4)• “A mobile device such as, for example, a wireless communications device
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(e.g., a wireless terminal, a wireless/mobile phone, a Personal Digital Assistant (PDA), a smart phone, a multi-media device including Global Positioning System (GPS) capability, etc.) and/or one or more systems that is/are providing service to the mobile device and/or to a device other than the mobile device, may be configured to enable one or more modes/functions of the mobile device and/or of the device other than the mobile device, responsive to a proximity criterion having been satisfied.” (’756 patent at 3:17-26)</p> <ul style="list-style-type: none">• “A wireless communications device may be configured to estimate a location associated therewith and may also be configured to estimate a value of at least one other parameter that may be associated with the wireless communications device, an environment thereof and/or an entity (living or otherwise) that is associated with and/or is proximate to the wireless communications device. The ‘at least one other parameter’ may, for example, be a velocity, acceleration, ToD, ToM, ToY, humidity, temperature, height, level of brightness, level of darkness, a blood pressure, a heart rate, a blood content, a physiological state, a psychological state, etc. As those skilled in the art will appreciate, the wireless communications device may be configured to estimate its location and the value of the ‘at least one other parameter’ by, for example, processing GPS signals and/or by using other means and/or sensors that may, according to some embodiments, be device-based and/or network assisted/based means and/or sensors.” (’756 patent at 6:17-34)• “In some embodiments, the first communications mode may comprise an air interface protocol, such as, for example, an Orthogonal Frequency Division Multiplexed and/or an Orthogonal Frequency Division Multiple Access (OFDM/OFDMA) protocol, a WiFi- and/or WiMAX-based air interface protocol that may be based upon Time Division Duplex (TDD) operation wherein a common set of frequencies are used bi-directionally (at different times) to provide uplink and downlink communications, and the first and/or second set of frequencies may comprise, for example, an un-licensed use and/or a licensed use set of frequencies.” (’756 patent at 7:21-31)• “In the specification, there have been disclosed embodiments and, although specific terms are employed, they are used in a generic and descriptive sense
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p style="text-align: center;">only and not for purposes of limitation.” (’756 patent at 13:6-9)</p> <p>The claims are thus akin to claims that other courts have found to be abstract. <i>See Amdocs (Israel) Ltd. v. Openet Telecom, Inc.</i>, 841 F.3d 1288, 1294 (Fed. Cir. 2016) (acknowledging that “the decisional mechanism courts now apply is to examine earlier cases in which a similar or parallel descriptive nature can be seen”). For example:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) <p>Indeed, the claims are directed to the same steps used in long-prevalent practices for engaging in a financial transaction that apply even outside the context of any computer implementation. <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307, 1314 (Fed. Cir. 2016). For example, to engage in a significant financial transaction, such as buying a house, the buyer has to (1) present proof the buyer is able to afford or otherwise authorized to engage in the purchase, such as by being pre-approved by a bank; (2) attend the contract signing in person; and (3) show a driver’s license or other form of photo identification to allow the notary to biometrically verify the</p>
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

	<p>identity of the buyer. Only after all three criteria are met, is the buyer able to consummate the financial transaction – an economic process and thus an abstract idea. <i>Alice</i>, 573 U.S. at 219-220; <i>see also Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021); <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020); <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017). As another example, to make purchases using a credit card, an individual must first submit a signed credit card application, and after authorization and receiving the credit card, must present the credit card in person at the store and further show a driver’s license or other form of photo identification before being allowed to complete a purchase. The fact that the asserted claims automate this process by controlling computer functionality does not confer patent eligibility. <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019). As shown by the cases identified above, the Federal Circuit has repeatedly found that applying abstract ideas to control computer functionality does not make the claims any less abstract.</p> <p>The fact that the software in the claims of the ’756 patent is implemented on a “smartphone” has no bearing on the <i>Alice</i> analysis because limiting the claims to a particular technological environment does not render them any less abstract. <i>Alice</i>, 573 U.S. at 226; <i>Repifi Vendor Logistics, Inc. v. IntelliCentrics, Inc.</i>, Appeal No. 2021-1906, 2022 WL 794971 (Fed. Cir, Mar. 15 2022). Indeed, the ’756 patent contends that its disclosure is applicable to numerous consumer electronic device. <i>See</i> ’756 patent at 1:60-2:8 (“As used herein, the term ‘end-user device,’ ‘wireless mobile device,’ ‘mobile wireless device’ or simply ‘device’ includes any electronic device that may be used to transmit/receive information wirelessly and/or non-wirelessly such as, for example, a Digital Subscriber Line (DSL) modem/transceiver; a cable modem/transceiver; a cellular and/or satellite radiotelephone with or without a multi-line display; Personal Communications System (PCS) terminals that may combine a radiotelephone with data processing, facsimile and/or data communications capabilities; Personal Digital Assistants (PDA) that can include a radio frequency transceiver and/or a pager, Internet/Intranet access, Web browser, organizer, calendar and/or a global positioning system (GPS) receiver; laptop and/or</p>
--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>palmtop computers or other appliances, which may (or may not) include a radio frequency transceiver.”).</p> <p>Moreover, whether the claimed control occurs in response to one or multiple criteria being met does not change the abstract nature of the claims. <i>RecogniCorp, LLC v. Nintendo Co., Ltd.</i>, 855 F.3d 1322, 1327 (Fed. Cir. 2017).</p> <p>In addition, neither the claims nor the specification discloses any specific technological problem to be solved by the alleged invention, or a particular technological solution for solving any such problem. Instead, the patent is clear that the alleged invention is a business or design choice implemented using existing technological advancements. For example, all “Example[s]/Application[s]” in the specification describe usage scenarios from a consumer’s perspective (e.g., “Mr. Jones”) and how those usage scenarios allegedly improve the consumer experience without identifying any technological problems or solutions. <i>See</i> ’756 patent at 4:39-8:65. The ’756 patent admits that any technical terms used in describing those “Example[s]/Application[s]” are “commonly understood” and “generic.” ’756 patent at 2:38-43, 13:6-9. There is no disclosure in the ’756 patent specification, not to mention in the claims, of any improvement to a computer’s ability to perform any of the claimed steps (individually or a whole), including no disclosure of improved proximity sensing, improved determination if other parameters (e.g., biometrics) are met, improved authentication or authorization processes, or any new or improved wireless communication technology.</p> <p>Moreover, the entire disclosure in the specification and the corresponding claim elements are described at a high level of abstraction, with reference to generic, conventional hardware and routine software functions; or using only results-based functional language, without limiting the alleged invention or the claims to any particular technological solution. <i>See Affinity Labs of Texas, LLC v. Amazon.com Inc.</i>, 838 F.3d 1266, 1269 (Fed. Cir. 2016) (“The purely functional nature of the claim[s] confirm[] that [they are] directed to an abstract idea, not to a concrete embodiment of that idea.”).</p>
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

Finally, the '756 patent claims an effective filing date of November 4, 2008. At that time, systems and methods implementing the abstract ideas described in the '756 patent were conventional. *See, e.g.*, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that existed years before the alleged invention of the '756 patent.

Alice Step Two

The asserted claims also lack any additional features that constitute an inventive concept transforming them into a patent-eligible invention. *See Alice*, 573 U.S. at 221.

As a preliminary matter, because the abstract idea inquiry at *Alice* Step One and the inventive concept inquiry at *Alice* Step Two often overlap—particularly concerning the existence of a specific technological improvement, any applicable legal or factual analysis provided in the step 1 section above is herein incorporated into the step 2 section, and vice versa. *See e.g. Ancora Techs. v. HTC Am., Inc.*, 908 F.3d 1343, 1349 (Fed. Cir. 2018); *Elec. Power Group, LLC v. Alstom S.A.*, 830 F.3d 1350, 1353 (Fed. Cir. 2016).

Turning first to the claim as a whole, the ordered combination of claim elements does not constitute a technical improvement over the prior art or otherwise reflect any inventive concept. Rather, the claims are directed to “generalized steps to be performed on a computer using conventional computer activity.” *See Two-Way Media Ltd. v. Comcast Cable Commc’ns., LLC*, 874 F.3d 1329, 1337 (Fed. Cir. 2017). It is not directed to a specific implementation that improves a particular computer functionality (i.e., the way computers operate). *Finjan, Inc. v. Blue Coat Sys.*, 879 F.3d 1299, 1303 (Fed. Cir. 2018) (“In cases involving software innovations, [the abstract idea] inquiry often turns on whether the claims focus on “the specific asserted improvement in computer capabilities.” (citing *Enfish, LLC v. Microsoft Corp.*, 822 F.3d 1327, 1335-36 (Fed. Cir. 2016))). Nor is it directed to “an improvement in computer functionality [described with] the specificity required to . . . claim[] a way of achieving it.” *Ancora Techs. v. HTC Am., Inc.*, 908 F.3d 1343,

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>1349 (Fed. Cir. 2018). Tellingly, the specification describes the claimed invention solely using references to “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of any technological improvement over the prior arts; rather, the ’756 patent merely refers to broad aspects of existing technology that can be used to implement the abstract ideas at issue. <i>See, e.g.</i>, 1:60-2:8, 3:17-26, 6:17-34, 7:21-31. And the abstract idea implemented using such conventional computer activity cannot itself supply an inventive concept. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018).</p> <p>Indeed, the ’756 patent claims an effective filing date of November 4, 2008. At that time, systems and methods implementing the abstract ideas described in the ’756 patent were well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that existed years before the alleged invention of the ’756 patent.</p> <p>The ’756 patent claims are thus comparable to other claims where the Federal Circuit found no inventive concept. <i>See Amdocs</i>, 841 F.3d at 1294) (acknowledging that “the decisional mechanism courts now apply is to examine earlier cases in which a similar or parallel descriptive nature can be seen”).</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) <p>Further, the claims merely use results-oriented, functional language, without describing how to accomplish any function, and thus lack an inventive step that can render the claims patent eligible. <i>See, e.g., Affinity Labs of Texas, LLC v. Amazon.com Inc.</i>, 838 F.3d 1266, 1269 (Fed. Cir. 2016) (“The purely functional nature of the claim[s] confirm[] that [they are] directed to an abstract idea, not to a concrete embodiment of that idea.”); <i>Int’l Business Machines v. Zillow Group</i>, 50 F.4th 1371, 1379-80 (Fed. Cir. 2022) (claims “written in ‘result-based functional language’ that ‘does not sufficiently describe how to achieve these results in a non-abstract way’” were patent ineligible); <i>Two-Way Media v. Comcast Cable Comm’ns</i>, 874 F.3d 1329, 1337 (Fed. Cir. 2017) (claims do not “sufficiently describe how to achieve these results in a non-abstract way”). The asserted claims are ineligible at least because they are so broad “as to preempt a fundamental concept or idea.” <i>See e.g. DealerTrack, Inc. v. Huber</i>, 674 F.3d 1315, 1331 (Fed. Cir. 2012); <i>Ariosa Diagnostics, Inc. v. Sequenom, Inc.</i>, 788 F.3d 1371, 1379 (Fed. Cir. 2015) (explaining that even partial preemption may signal patent ineligible subject matter). Monopolization of such abstract ideas improperly tie up building blocks of science thereby thwarting innovation—“the primary object of the patent laws.” <i>Alice</i>, 573 U.S. at 216.</p> <p>Turning to this specific claim element, the claim element “[a] method of operating a device” (even if this preamble is found to be limiting) does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018).</p>
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>App’x 520 (Fed. Cir. 2021)</p> <ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>,
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>958 F.3d 1178 (Fed. Cir. 2020)</p> <ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.2]	<p>sensing by the device, using a device-based sensor, a parameter that is associated with the device, an environment of the device and/or a user of the device;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “sensing by the device, using a device-based sensor, a parameter that is associated with the device, an environment of the device and/or a user of the device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p><i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir.
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		2016).
[1.3]	determining by the device a value of the parameter that is sensed; and	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “determining by the device a value of the parameter that is sensed” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.4]	responsive to the value that is determined by the device for the parameter that is sensed satisfying a threshold criterion, enabling by the device a number of functions of the device and disabling by the device a function of the device;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the value that is determined by the device for the parameter that is sensed satisfying a threshold criterion, enabling by the device a number of functions of the device and disabling</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>by the device a function of the device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.5]	<p>wherein the parameter that is sensed using the device-based sensor, comprises a velocity, an acceleration, a time-of-day, 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; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein the parameter that is sensed using the device-based sensor, comprises a velocity, an acceleration, a time-of-day, 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” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[1.6]	wherein the device comprises a smartphone.	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein the device comprises a smartphone” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none"> • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
<p>[2.1]</p>	<p>The method of claim 1, wherein said enabling by the device a number of functions of the device comprises enabling by the device a number of functions of the device that is greater than or equal to one.</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said enabling by the device a number of functions of the device comprises enabling by the device a number of functions of the device that is greater than or equal to one” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[3.1]	The method of claim 1, further comprising:	<i>See supra</i> , [1.1 – 1.6].

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

<p>[3.2]</p>	<p>while said number of functions is enabled by having sensed by the device the parameter and by having determined by the device that the value of the parameter that is sensed satisfies the threshold criterion, requesting by the device from a second device an authorization to enable a function for conducting a financial transaction by the device;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “while said number of functions is enabled by having sensed by the device the parameter and by having determined by the device that the value of the parameter that is sensed satisfies the threshold criterion, requesting by the device from a second device an authorization to enable a function for conducting a financial transaction by the device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)
--------------	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc.v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[3.3]	responsive to the requesting, receiving by the device from the second device the authorization to enable the function for conducting the financial transaction; and	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the requesting, receiving by the device from the second device the authorization to enable</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>the function for conducting the financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[3.4]	responsive to receiving the authorization, enabling at the device the function for conducting the financial transaction.	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to receiving the authorization, enabling at the device the function for conducting the financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p><i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>1317 (Fed. Cir. 2020)</p> <ul style="list-style-type: none"> • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[4.1]	The method of claim 3, further comprising:	<i>See supra</i> , [3.1 – 3.4].
[4.2]	responsive to the device satisfying a proximity condition relative to an entity and responsive to the device sensing the parameter and determining the value that is associated with parameter that is sensed satisfies the threshold criterion, using by the device the function for conducting the financial transaction and conducting by the device the financial transaction by paying for a product.	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the device satisfying a proximity condition relative to an entity and responsive to the device sensing the parameter and determining the value that is associated with parameter that is sensed satisfies the threshold criterion, using by the device the function for conducting the financial transaction and conducting by the device the financial transaction by paying for a product” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)• <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014)• <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021)• <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[5.1]	The method of claim 3, further comprising:	<i>See supra</i> , [3.1 – 3.4].
[5.2]	enabling at the second device a function for conducting the financial transaction.	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “enabling at the second device a function for conducting the financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p><i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir.
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		2016).
[6.1]	A device that is configured to perform operations comprising:	<i>See supra</i> , [1.1]. In addition, whether a claim is facially directed to a method (such as claim 1) or a system (such as claim 6) is irrelevant to determining patent eligibility. <i>See Alice</i> , 573 U.S. at 226-27.
[6.2]	sensing by the device, using a device-based sensor, a parameter that is associated with the device, an environment of the device and/or a user of the device;	<i>See supra</i> , [1.2].
[6.3]	determining by the device a value of the parameter that is sensed; and	<i>See supra</i> , [1.3].
[6.4]	responsive to the value that is determined by the device for the parameter that is sensed satisfying a threshold criterion, enabling by the device a number of functions of the device and disabling by the device a function of the device;	<i>See supra</i> , [1.4].
[6.5]	wherein the parameter that is sensed using the device-based sensor, comprises a velocity, an acceleration, a time-of-day, 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; and	<i>See supra</i> , [1.5].
[6.6]	wherein the device comprises a smartphone.	<i>See supra</i> , [1.6].

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

[7.1]	The device of claim 6, wherein said enabling by the device a number of functions of the device comprises enabling by the device a number of functions of the device that is greater than or equal to one.	<i>See supra</i> , [2.1, 6.1-6.6].
[8.1]	The device of claim 6, wherein the operations further comprise:	<i>See supra</i> , [6.1-6.6].
[8.2]	while said number of functions is enabled by having sensed the parameter and by having determined by the device that the value of the parameter that is sensed satisfies the threshold criterion, requesting by the device from a second device an authorization to enable a function for conducting a financial transaction by the device;	<i>See supra</i> , [3.2].
[8.3]	responsive to the requesting, receiving from the second device the authorization to enable the function for conducting the financial transaction; and	<i>See supra</i> , [3.3].
[8.4]	responsive to receiving the authorization, enabling the function for conducting the financial transaction.	<i>See supra</i> , [3.4].
[9.1]	The device of claim 8, wherein the operations further comprise:	<i>See supra</i> , [8.1-8.4].
[9.2]	detecting by the device that a proximity condition has been satisfied between the device and an entity;	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i> , element [1.1]

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Turning to the specific claim element, the claim element “detecting by the device that a proximity condition has been satisfied between the device and an entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[9.3]	<p>sensing by the device the parameter and determining by the device the value that is associated with the parameter that is sensed satisfies the threshold criterion; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “sensing by the device the parameter and determining by the device the value that is associated with the parameter that is sensed satisfies the threshold criterion” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[9.4]	<p>responsive to the value that is associated with the parameter that is sensed satisfying the threshold criterion, using by the device the function for conducting the financial transaction and conducting by the device the financial transaction by paying for a product.</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the value that is associated with the parameter that is sensed satisfying the threshold criterion, using by the device the function for conducting the financial transaction and conducting by the device the financial transaction by paying for a product” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung's invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none"> • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty LTD. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[10.1]	The device of claim 8, wherein the operations further comprise:	<i>See supra</i> , [8.1-8.4].
[10.2]	causing a function for conducting the financial transaction to be enabled at the second device.	<i>See supra</i> , [5.2].
[11.1]	A method of operating a wireless device, the method comprising:	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “method of operating a wireless device” (even if limiting) does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p><i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir.
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		2016).
[11.2]	sensing by the wireless device, using a sensor of the wireless device, a parameter that is associated with the wireless device, an environment of the wireless device and/or a user of the wireless device;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “sensing by the wireless device, using a sensor of the wireless device, a parameter that is associated with the wireless device, an environment of the wireless device and/or a user of the wireless device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc.v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.3]	determining by the wireless device a value of the parameter that is sensed and determining by the wireless device whether or not the value that is sensed satisfies a threshold criterion;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “determining by the wireless device a value of the parameter that is sensed and determining by the wireless device</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>whether or not the value that is sensed satisfies a threshold criterion” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.4]	<p>responsive to the value that is sensed satisfying the threshold criterion, enabling a number of functions of the wireless device and disabling a function of the wireless device;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the value that is sensed satisfying the threshold criterion, enabling a number of functions of the wireless device and disabling a function of the wireless device” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

	<p><i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d
--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>1317 (Fed. Cir. 2020)</p> <ul style="list-style-type: none"> • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.5]	<p>requesting by the wireless device from a second device an authorization to enable a function for conducting a financial transaction;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “requesting by the wireless device from a second device an authorization to enable a function for conducting a financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none"> • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.6]	<p>responsive to the requesting, receiving by the wireless device from the second device the authorization to enable the function for conducting the financial transaction;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the requesting, receiving by the wireless device from the second device the authorization to enable the function for conducting the financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.7]	responsive to receiving the authorization, enabling at the wireless device the function for	For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i> , element [1.1]

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

<p>conducting the financial transaction; and</p>	<p>Turning to the specific claim element, the claim element “responsive to receiving the authorization, enabling at the wireless device the function for conducting the financial transaction” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)
--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramercial, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.8]	responsive to the wireless device satisfying a proximity condition relative to an entity and responsive to the wireless device sensing the parameter and determining that the value sensed satisfies the threshold criterion, using the function for conducting the financial transaction and conducting the financial transaction by paying for a product;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “responsive to the wireless device satisfying a proximity condition relative to an entity and responsive to the wireless device sensing the parameter and determining that the value sensed satisfies the threshold criterion, using the function for conducting the financial transaction and conducting the financial transaction by paying for a product” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2023)</p> <ul style="list-style-type: none"> • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(Fed. Cir. 2015)</p> <ul style="list-style-type: none"> • <i>Ultramercial, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.9]	<p>wherein the parameter that is sensed, using the sensor of the wireless device, comprises a velocity, an acceleration, a time-of-day, 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; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein the parameter that is sensed, using the sensor of the wireless device, comprises a velocity, an acceleration, a time-of-day, 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” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[11.10]	wherein the wireless device comprises a smartphone.	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein the wireless device comprises a smartphone” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir.
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2021)</p> <ul style="list-style-type: none">• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)• <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014)• <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021)• <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020)• <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020)• <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

[12.1]	The method of claim 11, wherein said enabling a number of functions of the wireless device comprises enabling a number of functions of the wireless device that is greater than or equal to one.	<i>See supra</i> , [2.1, 11.1-11.10].
[13.1]	The method of claim 11, further comprising:	<i>See supra</i> , [11.1-11.10].
[13.2]	enabling at the second device a function for conducting the financial transaction.	<i>See supra</i> , [5.2].
[14.1]	A wireless device that is configured to perform operations comprising:	<i>See supra</i> , [11.1]. In addition, whether a claim is facially directed to a method (such as claim 11) or a system (such as claim 14) is irrelevant to determining patent eligibility. <i>See Alice</i> , 573 U.S. at 226-27.
[14.2]	using a sensor of the wireless device and sensing a parameter that is associated with the wireless device, an environment of the wireless device and/or a user of the wireless device;	<i>See supra</i> , [11.2].
[14.3]	determining a value that is associated with the parameter that is sensed and determining whether or not the value satisfies a threshold criterion;	<i>See supra</i> , [11.3].
[14.4]	responsive to the value satisfying the threshold criterion, enabling a number of functions of the wireless device and disabling a function of the wireless device;	<i>See supra</i> , [11.4].

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

[14.5]	requesting from a second device an authorization to enable a function for conducting a financial transaction;	<i>See supra</i> , [11.5].
[14.6]	responsive to the requesting, receiving from the second device the authorization to enable the function for conducting the financial transaction;	<i>See supra</i> , [11.6].
[14.7]	responsive to receiving the authorization, enabling the function for conducting the financial transaction; and	<i>See supra</i> , [11.7].
[14.8]	responsive to the wireless device satisfying a proximity condition relative to an entity and responsive to the wireless device sensing the parameter and determining that the value of the parameter sensed satisfies the threshold criterion, using the function for conducting the financial transaction and conducting the financial transaction by paying for a product;	<i>See supra</i> , [11.8].
[14.9]	wherein the parameter that is sensed comprises a velocity, an acceleration, a time-of-day, 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; and	<i>See supra</i> , [11.9].

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

[14.10]	wherein the wireless device comprises a smartphone.	<i>See supra</i> , [11.10].
[15.1]	The wireless device of claim 14, wherein said enabling a number of functions of the wireless device comprises enabling a number of functions of the wireless device that is greater than or equal to one.	<i>See supra</i> , [2.1, 14.1-14.10].
[16.1]	The wireless device of claim 14, wherein the operations further comprise:	<i>See supra</i> , [14.1-14.10].
[16.2]	causing a function for conducting the financial transaction to be enabled at the second device.	<i>See supra</i> , [5.2].
[17.1]	The wireless device of claim 14, wherein said conducting the financial transaction by paying for a product comprises:	<i>See supra</i> , [14.1-14.10].
[17.2]	establishing by the wireless device a short-range wireless link with the entity;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “establishing by the wireless device a short-range wireless link with the entity” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)• <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014)• <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014)• <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021)• <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[17.3]	wirelessly transmitting information to the entity using unlicensed frequencies; and	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wirelessly transmitting information to the entity using unlicensed frequencies” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017) • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(Fed. Cir. 2021)</p> <ul style="list-style-type: none"> • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

<p>[17.4]</p>	<p>wirelessly receiving information from the entity using unlicensed frequencies;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wirelessly receiving information from the entity using unlicensed frequencies” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)
---------------	---	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc.v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none"> • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[17.5]	<p>wherein said wirelessly transmitting and said wirelessly receiving comprises using a time domain duplex protocol; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said wirelessly transmitting and said wirelessly receiving comprises using a time domain duplex protocol” does not add anything significant to the abstract idea at issue, consists</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(Fed. Cir. 2019)</p> <ul style="list-style-type: none"> • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>848 (Fed. Cir. 2016)</p> <ul style="list-style-type: none"> • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[17.6]	<p>wherein said establishing by the wireless device a short-range wireless link with the entity comprises establishing the short-range wireless link with the entity responsive to the wireless device satisfying the proximity condition relative to the entity and responsive to the wireless device sensing the parameter and determining that the value associated therewith satisfies the threshold criterion.</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said establishing by the wireless device a short-range wireless link with the entity comprises establishing the short-range wireless link with the entity responsive to the wireless device satisfying the proximity condition relative to the entity and responsive to the wireless device sensing the parameter and determining that the value associated therewith satisfies the threshold criterion” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none">• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021)• <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021)• <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020)• <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019)• <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017)• <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016)• <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016)• <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[18.1]	<p>The wireless device of claim 14, wherein said requesting from a second device an authorization to enable a function for conducting a financial transaction and/or said receiving from the second device the authorization to enable the function for conducting the financial transaction comprises:</p>	<p><i>See supra</i>, [14.1-14.10].</p> <p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said requesting from a second device an authorization to enable a function for conducting a financial transaction and/or said receiving from the second device the authorization to enable the function for conducting the financial transaction comprises” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020)
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[18.2]	<p>establishing by the wireless device a link with the second device, comprising a wireless link that comprises a distance that is greater than a distance associated with the proximity condition;</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “establishing by the wireless device a link with the second device, comprising a wireless link that comprises a distance that is greater than a distance associated with the proximity condition” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)• <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023)• <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(Fed. Cir. 2021)</p> <ul style="list-style-type: none"> • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

<p>[18.3]</p>	<p>wirelessly transmitting information to the second device over said wireless link using unlicensed and/or licensed frequencies; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wirelessly transmitting information to the second device over said wireless link using unlicensed and/or licensed frequencies” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the ’756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. ’756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none"> • <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021) • <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024) • <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)
---------------	---	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017). • <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016) • <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022) • <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016) • <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019) • <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019) • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir.
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none"> • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[18.4]	wirelessly receiving information from the second device over said wireless link using unlicensed and/or licensed frequencies;	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wirelessly receiving information from the second device over said wireless link using unlicensed and/or licensed frequencies” does not add anything significant to the abstract idea at issue,</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under Alice Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under Alice Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); see also <i>supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>(Fed. Cir. 2019)</p> <ul style="list-style-type: none"> • <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023) • <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019) • <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020) • <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App'x 520 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x
--	--	---

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>848 (Fed. Cir. 2016)</p> <ul style="list-style-type: none"> • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[18.5]	<p>wherein said wirelessly transmitting and/or said wirelessly receiving comprises using an orthogonal frequency division multiplexing and/or orthogonal frequency division multiple access protocol; and</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said wirelessly transmitting and/or said wirelessly receiving comprises using an orthogonal frequency division multiplexing and/or orthogonal frequency division multiple access protocol” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the ’756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p> <p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the '756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App'x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App'x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int'l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>App’x 520 (Fed. Cir. 2021)</p> <ul style="list-style-type: none"> • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024) • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int’l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App’x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App’x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App’x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>,
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>958 F.3d 1178 (Fed. Cir. 2020)</p> <ul style="list-style-type: none"> • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrMFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
[18.6]	<p>wherein said establishing by the wireless device a link with the second device comprises establishing the link with the second device responsive to the wireless device sensing the parameter and determining that the value sensed satisfies the threshold criterion.</p>	<p>For an explanation of why the claim is directed to an abstract idea under <i>Alice</i> Step One and how the claim elements viewed as an ordered combination fail to supply an inventive step under <i>Alice</i> Step Two, <i>see supra</i>, element [1.1]</p> <p>Turning to the specific claim element, the claim element “wherein said establishing by the wireless device a link with the second device comprises establishing the link with the second device responsive to the wireless device sensing the parameter and determining that the value sensed satisfies the threshold criterion” does not add anything significant to the abstract idea at issue, consists solely of well-understood, conventional, routine, and generic technology, and thus cannot supply an inventive concept under <i>Alice</i> Step Two.</p> <p>First, this claim element is merely part of the abstract idea embodied in the '756 patent claims and thus cannot supply an inventive concept under <i>Alice</i> Step Two. <i>See BSG Tech LLC v. Buyseasons, Inc.</i>, 899 F.3d 1281, 1290 (Fed. Cir. 2018); <i>see also supra</i>, [1.1].</p> <p>Second, the '756 patent application acknowledges that this element consists of technical concepts that are “commonly understood” and “generic” technical concepts. '756 patent at 2:38-43, 13:6-9. There is no disclosure of inventive or improved technology used to implement this claim element.</p>

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>Third, as evidenced by Samsung’s invalidity contentions for this claim element, this claim element was well-understood, conventional, routine, and generic technology. <i>See, e.g.</i>, cover pleadings, Exhibits 756-A01 to 756-A23, and Exhibit 756-B, which provide examples of numerous such systems and methods that describe this claim element years before the alleged invention of the ’756 patent.</p> <p>Fourth, numerous courts have found that similar claim limitations lack an inventive concept and do not confer patent eligibility:</p> <ul style="list-style-type: none">• <i>Universal Secure Registry LLC v. Apple Inc.</i>, 10 F.4th 1342 (Fed. Cir. 2021)• <i>Elec. Power Grp., LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016)• <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350 (Fed. Cir. 2024)• <i>Prism Techs. LLC v. T-Mobile USA, Inc.</i>, 696 F. App’x 1014 (Fed. Cir. 2017)• <i>Smartflash LLC v. Apple Inc.</i>, 680 F. App’x 977 (Fed. Cir. 2017).• <i>OpenTV, Inc. v. Apple Inc.</i>, Case No. 5:15-cv-02008-EJD, 2016 WL 344845 (N.D. Cal. Jan. 28, 2016)• <i>Beteiro, LLC v. BetMGM, LLC</i>, 626 F. Supp. 3d 789 (D.N.J. 2022)• <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307 (Fed. Cir. 2016)• <i>ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759 (Fed. Cir. 2019)• <i>Chamberlain Group, Inc. v. Techtronic Industries Co.</i>, 935 F.3d 1341, 1345 (Fed. Cir. 2019)• <i>In re AuthWallet, LLC</i>, Appeal No. 2022-1842, 2023 WL 3330298 (Fed. Cir. 2023)• <i>Trading Technologies Int’l, Inc. v. IBG LLC</i>, 921 F.2d 1378 (Fed. Cir. 2019)• <i>Ericsson Inc. v. TCL Communication Technology Holding Ltd.</i>, 955 F.3d 1317 (Fed. Cir. 2020)• <i>Mortgage Application Technologies, LLC v. MeridianLink, Inc.</i>, 839 F. App’x 520 (Fed. Cir. 2021)• <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App’x 591 (Fed. Cir. 2020)• <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App’x 950 (Fed. Cir. 2017)• <i>Eolas Technologies Inc. v. Amazon.com, Inc.</i>, Appeal No. 2022-1932, 2024 WL 371959 (Fed. Cir. 2024)
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<ul style="list-style-type: none"> • <i>Realtime Data LLC v. Array Networks Inc.</i>, Appeal No. 2021-2251, 2023 WL 4924814 (Fed. Cir. 2023) • <i>MyMail, Ltd. v. ooVoo, LLC</i>, Appeal No. 2020-1825, 2021 WL 3671364 (Fed. Cir. 2021) • <i>PersonalWeb Technologies LLC v. Google LLC</i>, 8 F. 4th 1310 (Fed. Cir. 2021) • <i>Sensormatic Electronics, LLC v. Wyze Labs, Inc.</i>, Appeal No. 2020-2320, 2021 WL 2944838 (Fed. Cir. 2021) • <i>Fast 101 Pty Ltd. v. CitiGroup Inc.</i>, 834 F. App'x 591 (Fed. Cir. 2020) • <i>Packet Intelligence LLC v. NetScout Sys., Inc.</i>, 965 F.3d 1299 (Fed. Cir. 2020) • <i>SRI Int'l, Inc. v. Cisco Systems, Inc.</i>, 930 F.3d 1295 (Fed. Cir. 2019) • <i>Secure Mail Solutions LLC v. Universal Wilde, Inc.</i>, 873 F.3d 905 (Fed. Cir. 2017) • <i>West View Research, LLC v. Audi AG</i>, 685 F. App'x 923 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FormFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir. 2017) • <i>Affinity Labs of Tex., LLC v. DirecTV</i>, 838 F.3d 1253 (Fed. Cir. 2016) • <i>Electric Power Group, LLC v. Alstom S.A.</i>, 830 F.3d 1350 (Fed. Cir. 2016) • <i>Shortridge v. Foundation Construction Payroll Service, LLC</i>, 655 F. App'x 848 (Fed. Cir. 2016) • <i>Mortgage Grader, Inc. v. First Choice Loan Services Inc.</i>, 811 F.3d 1314 (Fed. Cir. 2015) • <i>Ultramerical, Inc. v. Hulu, LLC</i>, 772 F.3d 709 (Fed. Cir. 2014) • <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350 (Fed. Cir. 2014) • <i>Boom! Payments, Inc. v. Stripe, Inc.</i>, 839 F. App'x 528 (Fed. Cir. 2021) • <i>Electronic Communication Technologies, LLC v. ShoppersChoice.com, LLC</i>, 958 F.3d 1178 (Fed. Cir. 2020) • <i>Bozemann Financial LLC v. Federal Reserve Bank of Atlanta</i>, 955 F.3d 971 (Fed. Cir. 2020) • <i>Smart Systems Innovations, LLC v. Chicago Transit Authority</i>, 873 F.3d 1364 (Fed. Cir. 2017) • <i>Clarilogic, Inc. v. FOrmFree Holdings Corp.</i>, 681 F. App'x 950 (Fed. Cir.
--	--	--

Exhibit 756-C
Subject Matter Eligibility Contentions for 11,770,756

		<p>2017)</p> <ul style="list-style-type: none">• <i>In re TLI Communications LLC Patent Litigation</i>, 823 F.3d 607 (Fed. Cir. 2016).
--	--	--