

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

PAYGEO, LLC,
Patent Owner.

Case IPR2025-01552
U.S. Patent No. 10,796,296

PATENT OWNER'S PRELIMINARY RESPONSE

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PATENT OWNER'S EXHIBIT LIST

EXHIBIT	DESCRIPTION
2001	Excerpts of File History for U.S. Patent Application Publication No. 2015/0161592
2002	Complaint for Patent Infringement, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP, Dkt. No. 1 (E.D. Tex. Apr. 2, 2025)
2003	Second Amended Docket Control Order, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP, Dkt. No. 52 (E.D. Tex. Oct. 2, 2025)
2004	Order, <i>Resonant Sys., Inc. v. Sony Grp. Corp.</i> , No. 2:22-cv-00424-JRG, Dkt. No. 84 (E.D. Tex. July 9, 2024)
2005	Excerpts of Defendants' Invalidity Contentions, <i>PayGeo, LLC v. Samsung Elecs. Co.</i> , No. 25-cv-00334-RWS-RSP (E.D. Tex.), served on November 3, 2025
2006	Docket Navigator webpage, Motion Outcomes for Motions to Stay Pending <i>Inter Partes</i> Review in the Eastern District of Texas, dated January 1, 2020 through November 21, 2025
2007	Lex Machina webpage, Motion Metrics for Stay Pending PTAB in the Eastern District of Texas, dated January 1, 2020 through November 21, 2025
2008	Excerpts from U.S. District Court – Federal Case Management Statistics, Median Time from Filings to Trial (E.D. Tex.), 12-Month Periods Ending June 30, 2025, available at https://www.uscourts.gov/sites/default/files/document/fcms_na_distprofile0630.2025.pdf
2009	Docket Navigator Webpage, Time to Trial in the Eastern District of Texas, dated January 1, 2022 through November 21, 2025
2010	U.S. Patent Application Publication No. 2013/0024360-A1

Patent Owner's Preliminary Response
IPR2025-01552 (U.S. Patent No. 10,796,296)

EXHIBIT	DESCRIPTION
2011	Order, <i>Kirsch Rsch. and Dev. LLC v. DuPont de Nemours, Inc.</i> , No. 5:20-cv-00057-RWS, Dkt. No. 269 (E.D. Tex. July 7, 2021)
2012	U.S. Patent Application Publication No. 2008/0010191 (“Rackley 191 Application”)

I. INTRODUCTION

PayGeo respectfully requests that the Director deny the Petition challenging claims 1-14 (the “Challenged Claims”) of U.S. Patent No. 10,796,296 (Ex. 1001, “the ’296 Patent”) because *Lin* (Ex. 1005) does not disclose a “program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity” or “providing a login interface requesting security credentials from a first member . . . before the first member can access the service.” ’296 Patent, Claim 1.

The ’296 Patent claims systems and methods for facilitating electronic payments from a payor to a payee using program code stored in memory. The “program code” is “associated with a service provided by a third-party entity” and enables the payor to initiate electronic payments from “a third-party account,” a linked credit card account, and a linked financial institution account. In the ’296 Patent, the “third-party” is an entity separate from the credit card company, financial institution, and payee/payor, but it is not a “third party” to the program code or service. The same third-party that provides the third-party account must also provide the service associated with the program code. Accordingly, a user may download **program code** (the PayGeo Application) associated with a **third-party service** (the PayGeo Platform) provided by a **third-party entity** (PayGeo), which enables payments from the user’s **third-party account** (the user’s PayGeo account).

Lin does not disclose program code associated with a service provided by the same third-party entity that provides the third-party account. In *Lin*'s system, the **program code** (transaction application) is not associated with what Petitioners contend is the **service** (allegedly the "Apple Ecosystem"), it is merely an application that may be loaded on a mobile device. Consequently, Petitioners also struggle to identify where *Lin* discloses program code providing a "login interface requesting security credentials . . . before the first member can access the service" because the transaction application does not and would not prompt the user to enter her Apple Ecosystem credentials. *Rackley* does not cure *Lin*'s deficiencies because *Rackley* is not alleged to disclose a login interface that would log the user into the Apple Ecosystem.

The Director should deny institution because Petitioners have not established a reasonable likelihood that any claim of the '296 Patent is unpatentable.

II. OVERVIEW OF THE '296 PATENT

A. The '296 Patent

The '296 Patent discloses systems and methods for providing a platform that "enables members to transfer, receive, or otherwise exchange cash and digital currency" in a mobile telecommunications environment. '296 Patent, 4:16-20. The Challenged Claims require "program code associated with a service provided by a third-party entity" to members who register with such service.

The '296 Patent describes a mobile transaction platform (the "PayGeo platform") "for allowing the transfer or exchange of cash, commodities . . . or other valuables, between members (or non-members) in a mobile environment." *Id.* at 9:23-30. The below system depicts the claimed operating environment of the PayGeo platform:

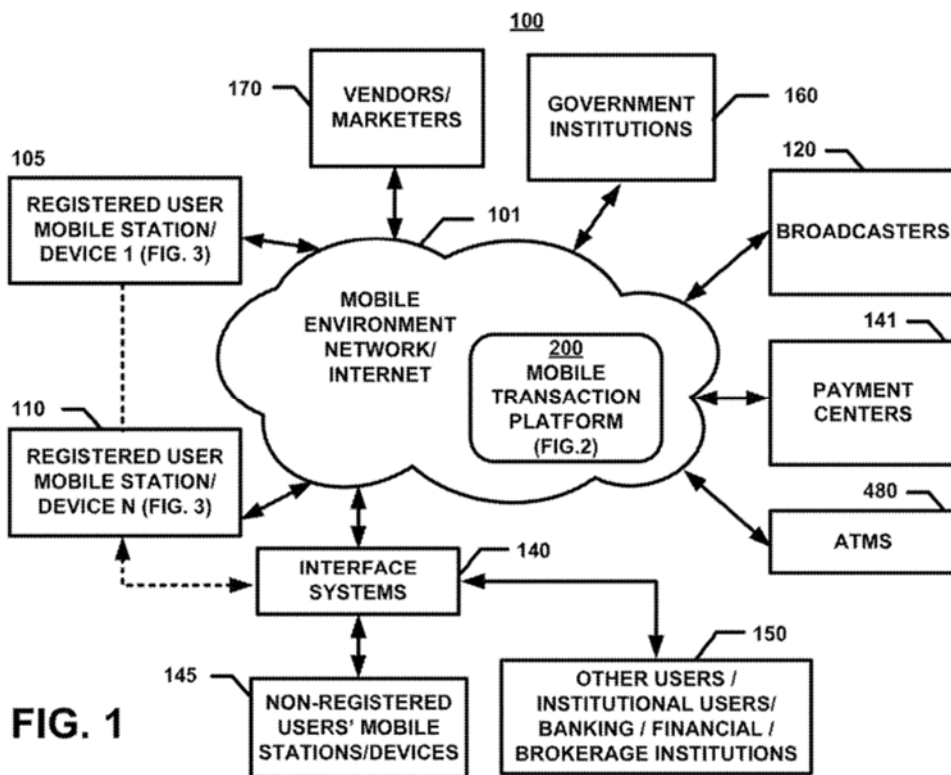


FIG. 1

Id. at Fig. 1. The PayGeo platform "selectively communicates with a plurality of users, such as the registered users 105, 110, non-registered users 145, . . . institutional users, banking or financial institutions, . . . and allows them to selectively communicate amongst each other and with the [PayGeo] platform 200" using "a plurality of corresponding interface systems 140." *Id.* at 9:30-40. The

below system depicts the claimed mobile transaction platform and various communication interfaces:

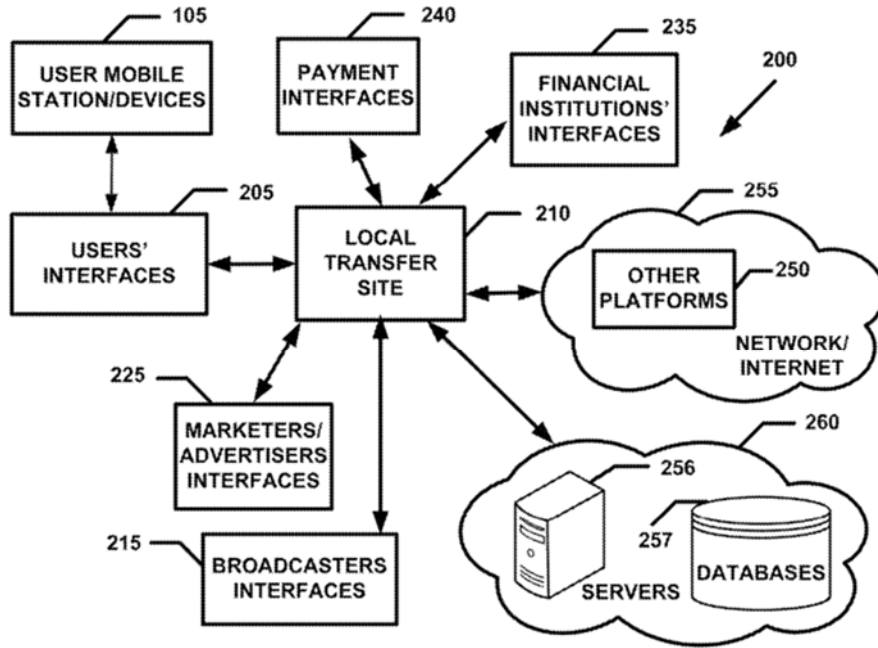


FIG. 2

Id. at Fig. 2.

B. Overview of the Challenged Claims

The Petition presents the following grounds for challenging the claims of the '296 Patent.

Ground	Claims	Basis	References Relied Upon
1	1-14	§ 103	<i>Lin</i> and <i>Rackley</i>
2	1-14	§ 103	<i>Lin</i> , <i>Rackley</i> , and <i>Tumminaro</i>

Pet. at 6.

Claims 1 and 8 are independent claims. Claim 1 recites a system and is reproduced in part below using the Petition's element numbering:

[1.pre] A system, comprising:

[1.a.i] memory storing program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity,

[1.b.i] one or more hardware processors configured to execute the program code to cause the system to perform a process of:

[1.b.ii] providing a login interface requesting security credentials from a first member of the plurality of members before the first member can access the service, the first member having previously registered with the service;

'296 Patent, 24:2-25:54. Claim 8 similarly recites the method claim that corresponds to Claim 1. *Id.* at 26:8-28:16.

Although there are multiple reasons the '296 Patent is valid over *Lin*, *Rackley*, and *Tumminaro*,¹ this Preliminary Response focuses on only limited reasons why *inter partes* review should not be instituted. *See Travelocity.com L.P. v. Cronos Techs., LLC*, No. CBM2014-00082, Paper 12 at 10 (P.T.A.B. Oct. 16, 2014)

¹ Petitioners do not rely on *Tumminaro* (Ex. 1007) with respect to the claim elements argued below.

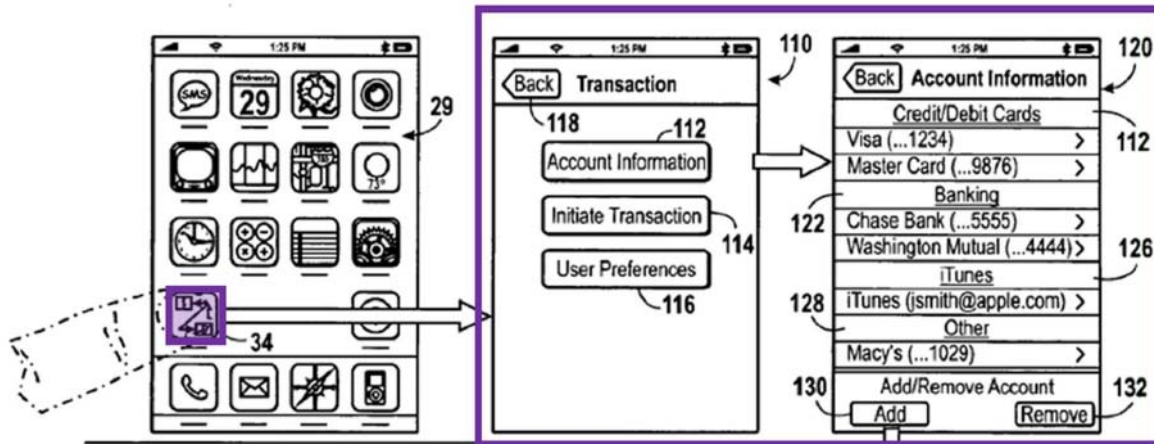
(“[N]othing may be gleaned from the Patent Owner’s challenge or failure to challenge the grounds of unpatentability for any particular reason.”).

III. OVERVIEW OF THE ASSERTED REFERENCES

A. *Lin* Does Not Disclose Program Code Associated with a Service Provided by the Third-Party

Lin does not disclose a program code that is associated with a third-party entity (*i.e.*, “program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity”). Rather, *Lin* discloses conducting financial exchanges with a transaction application that provides “the ability to initiate and receive transactions” involving cash and non-cash assets between devices. *Lin*, [0085], [0121], [0132]. The transaction application includes “encoded instructions” (allegedly the “program code”) that enable peer-to-peer financial exchanges involving “monetary instruments, such as credit card and bank accounts,” and other non-cash accounts (allegedly the “third-party entity”), such as an iTunes account. *Id.*, [0252], [0375].

Lin’s transaction application, illustrated in Figure 5A, shows a user interface for adding and removing payment sources, including credit card companies, bank institutions, and third-party accounts (*e.g.*, iTunes):



Pet. at 14 (citing *Lin*, Fig. 5A) (annotations reproduced). *Lin* does not disclose that this transaction application is associated with any service provided by the same third-party entity that provides a third-party account.

B. *Rackley* Does Not Disclose a Login Associated with a Third-Party Service

Rackley (Ex. 1006) does not disclose providing a login interface for a user to access third-party services (*i.e.*, “login interface requesting security credentials from a first member . . . before the first member can access the service, the first member having previously registered with the service”). Rather, *Rackley* discloses methods and systems for providing a financial payment to a payee (or recipient) “utilizing a mobile device” that generates a “mobile payment instruction comprising information corresponding to the payment” and is wirelessly communicated to a mobile financial transaction system (MFTS) that verifies and

executes the payment. *Rackley*, Abstract; '296 Patent, 2:14-34 (citing *Rackley* as prior art)².

Rackley describes a mobile financial transaction system (MFTS) that enables a payee to make a payment to a selected payor using a payment source (*Rackley*, [0030]) including “credit card accounts, debit card accounts, checking and/or saving accounts, department store credit card accounts” (*id.*, [0115]). *Rackley* does not disclose the use of non-traditional monetary assets as contemplated in the '296 Patent or the non-cash assets (*e.g.*, iTunes credits) as disclosed in *Lin*. Accordingly, *Rackley* does not disclose a non-traditional financial/banking institution (*i.e.*, a third-party entity) that would provide services to a user upon logging in to an account with the third-party entity.

IV. LEVEL OF ORDINARY SKILL IN THE ART

For purposes of this Preliminary Response, PayGeo adopts Petitioners' definition of a person of ordinary skill in the art: “A person of ordinary skill in the art ('POSITA') would have had at least a bachelor's degree in electrical engineering,

² The '296 Patent cites and distinguishes U.S. Patent Application Publication No. 2008/0010191 (“*Rackley* 191 Application,” Ex. 2012), which is substantially the same as U.S. Patent Application Publication No. 2008/0010192 (“*Rackley* 192 Application,” Ex. 1006) cited in the Petition.

computer science, or a similar field and at least two years of experience in the field of mobile applications and/or related payment systems. Additional relevant work experience can compensate for less education, and vice versa.” Pet. at 5.

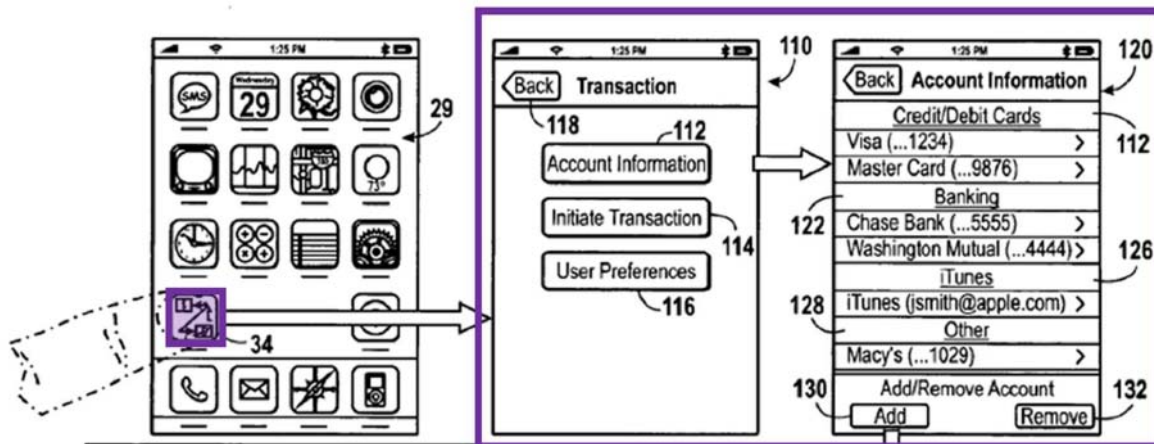
V. PETITIONERS FAIL TO DEMONSTRATE A REASONABLE LIKELIHOOD OF SUCCESS ON ANY CHALLENGED CLAIM

The Board should deny the Petition because the asserted references do not render obvious at least Claim 1 and Claim 8 of the Challenged Claims.

A. *Lin* Does Not Disclose Program Code Associated with a Service Provided by a Third-Party Entity (Grounds 1, 2)

Lin does not teach or suggest a “storing *program code associated with a service provided by a third-party entity* to a plurality of members who register with the service provided by the third-party entity.” ’296 Patent, Claims 1, 8 (emphasis added). Petitioners do not rely on *Tumminaro* for this limitation.

Lin’s transaction application is not associated with a service provided by the alleged third-party, *i.e.*, Apple. Petitioners map *Lin*’s transaction application 34 to the claimed “program code,” *Lin*’s Apple ecosystem to the claimed “service provided by a third-party,” and *Lin*’s non-cash assets, such as an iTunes account 128 to the claimed “third-party entity.” Pet. at 13-15.



Id. at 14 (annotating Fig. 5A of *Lin*). However, the transaction application is not disclosed to be associated with any Apple service provided to members who register with the service.

Petitioners' argument that *Lin* teaches or suggests this limitation fails because *Lin*'s transaction application is not "***accessed through*** 'iTunes® accounts held by the payee and payor,'" as Petitioners contend. *Id.* (citing *Lin*, [0255]-[0256]) (emphasis added). Petitioners have it exactly backwards: the transaction application may allow a user to access her iTunes accounts ***through*** the transaction application, but there is no sense in which the user's iTunes credentials give the user access to the transaction application. *Lin*, [0115], [0255]-[0266]. *Lin*'s disclosure that its non-cash embodiments are optional reinforces the fact that the transaction application itself is not actually associated with any service provided by Apple. *Id.*, [0252] (disclosing that the "techniques set forth in the present disclosure ***may be applicable*** to" an iTunes account) (emphasis added).

Petitioners' reference to *Rackley* does not cure the above deficiencies because *Rackley* does not disclose any correspondence between its "service" and any third-party accounts. Assuming *arguendo* that a POSITA would have modified *Lin* with *Rackley*'s registration methods, this would merely register the user for access to the transaction application, not alleged "service" from *Lin* (*i.e.*, the Apple ecosystem). Pet. at 15-16. Accordingly, even assuming a POSITA would have combined *Lin* and *Rackley* as alleged in the Petition, Petitioners have failed to identify with particularity how the alleged combination satisfies independent Claims 1 and 8 of the Challenged Claims. 37 C.F.R. § 42.104(b)(4).

For at least the foregoing reasons, *Lin* and/or the *Lin-Rackley* combination does not teach or suggest a "program code associated with a service provided by a third-party entity to a plurality of members who register with the service provided by the third-party entity."

B. *Lin* Does Not Disclose Program Code that Provides a Login Interface for the Service (Grounds 1, 2)

Lin also fails to disclose program code that provides "a login interface" for the alleged "third-party service," and *Rackley* does not (and is not alleged to) cure this deficiency. '296 Patent, Claims 1, 8. Petitioners do not rely on *Tumminaro* for this limitation.

In *Lin*'s system, a user can configure "security features 74" to set lock certain features of the iPhone®, but Petitioners do not (1) identify where *Lin* discloses the

transaction application would provide that login interface or (2) argue that unlocking an iPhone's "peer-to-peer transaction features" is tantamount to validating the user's access to a third-party service associated with the transaction application. Pet. at 21-23. Indeed, as Petitioners admit, "a user of the transaction application would already be logged in to the Apple ecosystem" (*id.* at 24), which Petitioners allege to be the "service" (*id.* at 15). Accordingly, *Lin* does not disclose a transaction application that provides a login interface to the Apple ecosystem that Petitioners allege to be the "service provided by a third-party."

Petitioners' attempt to cure this deficiency with reference to *Rackley* fails because *Rackley* also does not disclose any correspondence between its "service" and any third-party accounts. Assuming *arguendo* that a POSITA would have modified *Lin* with *Rackley*'s "login interface," that interface does not give the user access to the alleged "service" (*i.e.*, the Apple ecosystem), it would give the user access to the transaction application. Pet. at 24-25. Accordingly, even assuming that a POSITA would have combined *Lin* and *Rackley* as alleged in the Petition, Petitioners have failed to identify with particularity how the alleged combination satisfies independent Claims 1 and 8 of the Challenged Claims. 37 C.F.R. § 42.104(b)(4).

For at least the foregoing reasons, *Lin* and/or the *Lin-Rackley* combination does not teach or suggest a "login interface requesting security credentials from a

first member . . . before the first member can access the service.” PayGeo respectfully submits that Samsung has not raised a reasonable likelihood that any claim of the '296 Patent is unpatentable.

VI. CONCLUSION

For all of these reasons, PayGeo requests that the Director deny institution of *inter partes* review of the Challenged Claims of the '296 Patent.

Respectfully submitted,

Date: January 6, 2026

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CERTIFICATE OF COMPLIANCE WITH 37 C.F.R. § 42.24

The undersigned hereby certifies that the portions of the foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** has 2,212 words in compliance with the 14,000 word limit set forth in 37 C.F.R. § 42.24. This word count was prepared using the Microsoft Word word-processing system used to prepare this paper.

Dated: January 6, 2026

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, service was made on Petitioners as detailed below.

<i>Date of service</i>	January 6, 2026
<i>Manner of service</i>	Electronic Filing with the Board (joshua.goldberg@finnegan.com; benjamin.saidman@finnegan.com; nicholas.cerulli@finnegan.com; alexander.boyer@finnegan.com; christina.yang@finnegan.com; christopher.anderson@finnegan.com; connor.mcgregor@finnegan.com)
<i>Documents served</i>	PATENT OWNER'S PRELIMINARY RESPONSE
<i>Persons Served</i>	Finnegan, Henderson, Farabow, Garrett & Dunner, LLP: Joshua L. Goldberg Benjamin A. Saidman Nicholas A. Cerulli Alexander M. Boyer Christina Ji-Hye Yang Christopher B. Anderson Connor M. McGregor

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