
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

GUI GLOBAL PRODUCTS, LTD.,
Patent Owner.

Case IPR2021-00472
Patent 10,562,077

PATENT OWNER'S RESPONSE TO PETITION FOR *INTER PARTES* REVIEW

TABLE OF CONTENTS

II. BACKGROUND.....3

 A. OVERVIEW OF THE ‘077 PATENT.....3

 B. PROSECUTION HISTORY5

III. LEVEL OF ORDINARY SKILL5

IV. CLAIM CONSTRUCTION6

V. THE ALLEGED GUNDLACH-LEE COMBINATION.6

 A. OVERVIEW OF GUNDLACH.....6

 B. OVERVIEW OF LEE.....8

 C. APPLE’S REASONS FOR COMBINING GUNDLACH AND LEE ARE, TO A POSITA,
UNFOUNDED AND UNPERSUASIVE, AND HEAVILY OUTWEIGHED BY THE
INEFFICIENCIES OF SUCH A SYSTEM.9

 D. A POSITA WOULD NOT HAVE BEEN MOTIVATED TO REPLACE GUNDLACH’S
EFFICIENT CONDUCTIVE CHARGING WITH FAR LESS EFFICIENT INDUCTIVE CHARGING.
ANY ALLEGED BENEFITS FROM WIRELESS CHARGING WOULD HAVE BEEN GREATLY
OUTWEIGHED BY THE INEFFICIENCIES AND ADDITIONAL COST, SIZE AND WEIGHT.
FURTHER A POSITA WOULD HAVE BEEN EVEN LESS MOTIVATED TO USE LEE’S EVEN
MORE INEFFICIENT DUAL PURPOSE TRANSDUCER COIL DESIGN.20

E. A POSITA WOULD NOT HAVE UNDERSTOOD LEE’S CHARGING PAD TO BE APPLICABLE TO ITS DUAL PURPOSE WIRELESS CHARGING SOLUTION.	35
F. A POSITA WOULD NOT BE MOTIVATED TO MAKE THE PROPOSED GUNDLACH-LEE COMBINATION BECAUSE IT WOULD DRAIN THE CLAMSHELL CASE BATTERY, RESULTING IN A HIGHLY UNDESIRABLE CHARGING SYSTEM.....	36
VI. THE CHALLENGED CLAIMS ARE NOT OBVIOUS	39
A. GROUND 1A—GUNDLACH AND LEE DO NOT RENDER CLAIMS 1, 2, 8, 9, AND 11 OBVIOUS.....	41
1. <i>Claim 1</i>	41
2. <i>Claim 2</i>	54
3. <i>Claim 8</i>	55
4. <i>Claim 9</i>	55
5. <i>Claim 11</i>	56
B. GROUND 1B—GUNDLACH, LEE, AND NISHIKAWA DO NOT RENDER CLAIMS 2 AND 8 OBVIOUS.	57
1. <i>Overview of Nishikawa</i>	57
2. <i>Analysis of Claims 2 and 8</i>	57
C. GROUND 1C: CLAIM 11 IS NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, AND ROSENER.....	58
1. <i>Overview of Rosener</i>	58

2. <i>Analysis of Claim 11</i>	58
F. GROUND 2A: CLAIMS 1, 2, 8, 9, AND 11 ARE NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, AND KIM.	72
1. <i>Overview of Kim</i>	72
2. ANALYSIS OF ELEMENT [11].....	72
G. GROUND 2B: CLAIMS 2 AND 8 ARE NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, KIM, AND NISHIKAWA.....	73
H. GROUND 2C: CLAIM 11 IS NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, KIM, AND ROSENER.	73
I. GROUND 2D: CLAIMS 3 AND 7 ARE NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, KIM, AND BROWN.	73
J. GROUND 2E: CLAIMS 4, 5, 10, 12, AND 13 ARE NOT OBVIOUS IN VIEW OF GUNDLACH, LEE, KIM, AND MAK-FAN.	74
VII.	CONCLUSION

TABLE OF AUTHORITIES

Cases

<i>CFMT, Inc. v. Yieldup Intern. Corp.</i> , 349 F.3d 1333 (Fed. Cir. 2003)	43
<i>Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.</i> , 800 F.3d 1375 (Fed. Cir. 2015)	43
<i>Harmonic Inc. v. Avid Tech., Inc.</i> , 815 F.3d 1356 (Fed. Cir. 2016).....	43
<i>Hartness Int’l. Inc. v. Simplimatic Engineering Co.</i> , 819 F.2d 1100 (Fed. Cir. 1987)	43
<i>In re Gordon</i> , 733 F.2d 900 (Fed. Cir. 1984)	43
<i>In re Magnum Oil Tools Int’l, Ltd.</i> , 829 F.3d 1364 (Fed. Cir. 2016).....	43
<i>In re Ratti</i> , 270 F.2d 810 (CCPA 1959).....	43
<i>In re Warner</i> , 379 F.2d 1011 (CCPA 1967)	42
<i>Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.</i> , 821 F.3d 1359 (Fed. Cir. 2016)	42
<i>KSR Int’l v. Teleflex Inc.</i> , 550 U.S. 398 (2007)	42, 43
<i>SAS Inst. Inc. v. Iancu</i> , 138 S. Ct. 1348 (2018)	42

Regulations

37 C.F.R. § 42.108(c).....	43
----------------------------	----

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.