

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOMENTUM DYNAMICS CORPORATION,
Petitioner,

v.

WITRICITY CORPORATION,
Patent Owner.

Case IPR2021-01127
Patent 9,306,635

PATENT OWNER'S RESPONSE

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I. INTRODUCTION

Witricity Corporation (“Patent Owner”) submits this Patent Owner’s Response to the Petition for *Inter Partes* Review of U.S. Patent No. 9,306,635 (“the ’635 patent”) filed by Momentum Dynamics Corporation (“Petitioner”). The Petition suffers from both factual and legal errors, each of which provides an independent basis to uphold the challenged claims. Petitioner has failed to carry its burden to show unpatentability of the challenged claims.

For example, in Grounds 1 and 2, Petitioner relies on a flawed assumption—that reducing near field strength—is sufficient to meet the requirements of claim 1. But this assumption is inconsistent with the proper construction of “the first magnetic field outside a spatial region through which power is transferred from the first source magnetic resonator to the device magnetic resonator” and leads to Petitioner’s flawed analysis.

Further, in Ground 1, Petitioner fails to prove anticipation based on Kanno (EX1005) because the Petition improperly combines multiple, distinct teachings of Kanno that relate to different embodiments. As discussed in more detail below, Petitioner relies on Kanno’s disclosures corresponding to Example 1, the “fundamental arrangement” of Figures 1, 7, and 9, and the embodiment of Figure 16, each of which describe separate embodiments. However, Kanno’s Figure 16 embodiment (Kanno, 20:18-21:31) is not linked to the fundamental arrangement of

Figures 1, 7, and 9 (Kanno, 6:50-7:50, 11:9-12:14) or the embodiment set forth in Example 1 (Kanno, 25:44-28:41), and Petitioner provides no explanation of why a POSITA would conclude otherwise.

As to Ground 2, Petitioner fails to prove obviousness based on Kanno because the Petition has not shown that a POSITA would have been motivated to combine and apply the elements of the embodiment described by Figure 16 with the fundamental arrangement of Figures 1, 7, and 9 and the embodiment set forth in Example 1.

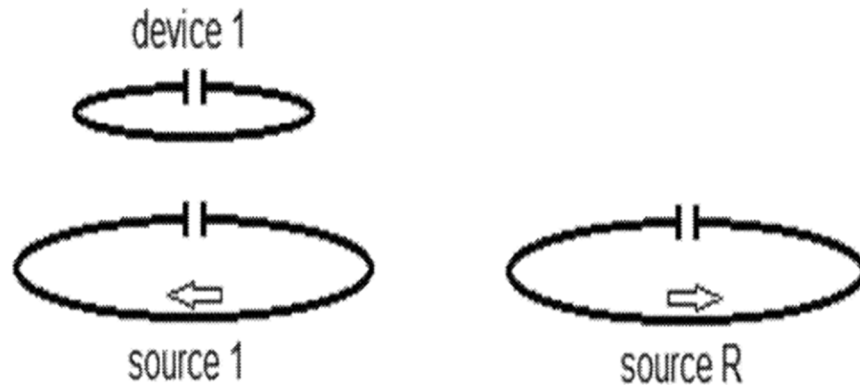
In light of these deficiencies in the Petition, and others detailed below, the Board should uphold the challenged claims.

II. SUMMARY OF THE '635 PATENT

The challenged claims of the '635 patent are directed to systems for wireless transfer that reflect the inventors' recognition that "[i]n some wireless power transfer applications, it may be beneficial to minimize or reduce the electric and magnetic fields at a distance away from the system," and it would be desirable "to accomplish this without a substantial decrease of the performance of the system, and/or dramatic changes to the external geometry of the system." EX1001, 51:29-39.

FIG. 40 of the '635 patent shows a simplified example of one such wireless energy transfer system with reduced fields away from the system. EX1001, 52:34-

53:7.



EX1001, FIG. 40. The system includes a source resonator (source 1) and a device resonator (device 1). EX1001, 52:36-37. The inventors recognized, however, that an additional resonator (source R) could be added to “cancel the dipole moment far from the system.” EX1001, 52:38-39. More specifically, the ’635 patent discloses that the current of the additional resonator (source R) can be adjusted to be exactly or substantially out of phase with the source resonator (source 1) to reduce electrical and magnetic fields far away from the system. EX1001, 52:34-42.

Additionally, the ’635 patent discloses that source 1 and source R can be designed such that they “are of identical or near identical sizes and have an equal number of wires, that the orientation of their dipoles are substantially the same, and that they circulate substantially the same amount of current.” EX1001, 52:42-47. Further, the system can be configured such that “the centers of the wireless power system and the source R are not very far from each other.” EX1001, 53:3-5.

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