

Filed on behalf of: Momentum Dynamics Corporation

Entered: April 18, 2022

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

PETITIONER'S REPLY

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Exhibit List

Ex.	Description
1001	U.S. Patent No. 9,306,635 (the “635 patent”)
1002	U.S. Patent No. 9,306,635 File History (the “635 FH”)
1003	Declaration of Dr. David Arnold
1004	Curriculum Vitae of Dr. David Arnold
1005	U.S. Patent No. 8,698,350 (“Kanno”)
1006	U.S. Patent Application Publication No. 2010/0237709 (“Hall”)
1007	U.S. Patent Application Publication No. 2010/0181843 (“Schatz”).
1008	Joseph C. Stark, III, <i>Wireless Power Transmission Utilizing a Phased Array of Tesla Coils</i> (May 2004) (M.A. thesis Massachusetts Institute of Technology)
1009	U.S. Letter Patent No. 454,622 (“Tesla”)
1010	Jay Newman, <i>Physics of the Life Sciences</i> (Springer Science + Media, LLC 2008) (“ <i>Physics of Life Sciences</i> ”)
1011	Ruth W. Chabay et al, <i>Matter & Interactions</i> (John Wiley & Sons, Inc. 3d ed. 2011) (“ <i>Matter & Interactions</i> ”)
1012	U.S. Patent No. 4,240,010 (“Buhner”)
1013	U.S. Patent Application Publication. No. 2009/0051224 (“Cook”)
1014	U.S. Patent Application Publication No. 2011/0125007 (“Steinberg”)

I. Introduction

The Petition is supported by the Declaration of Dr. David Arnold (Ex. 1003) and established that claims 1-8 are anticipated and rendered obvious by Kanno. This Reply addresses Patent Owner's flawed attorney arguments, unsupported by any expert testimony, on each ground.

Patent Owner does not dispute that Kanno discloses every element of the claims under their plain meaning. Instead, Patent Owner attempts to distinguish Kanno by: (i) importing a "far-field radiation" limitation into the claims; (ii) arguing that the Petition relied on distinct embodiments of Kanno; and (iii) disputing that a POSA would have been motivated to combine certain disclosures of Kanno.

But nothing in the intrinsic record supports departing from the plain meaning to inject a "far-field radiation" requirement, and in any event, Kanno's system meets it. Further, the Petition not only relied on a single preferred embodiment of Kanno, but also showed that Kanno anticipates the claims independent of the supposedly "distinct" embodiment. Relatedly, no motivation is required for what Kanno discloses expressly.

II. Claim Construction

Claim 1 recites:

"wherein the first and second source magnetic resonators are positioned so that the second magnetic field at least partially cancels **the first magnetic field** *outside a spatial region through which power is*

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