#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re <i>Inter Partes</i> Review of:	)
U.S. Patent No. 8,304,935	)
Issued: Nov. 6, 2012	)
Application No.: 12/647,763	)
Filing Date: Dec. 28, 2009	)

For: Wireless Energy Transfer Using Field Shaping to Reduce Loss

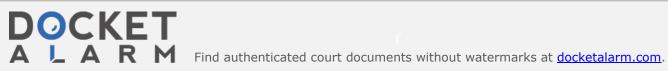
FILED VIA E2E

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,304,935



## **TABLE OF CONTENTS**

I.	Intro	oductio	on	1
II.	Iden	tificat	ion of Challenges (37 C.F.R. § 42.104(b))	2
III.	Background			2
	A.	The '935 Patent (Ex. 1001)		
	B.	Prosecution History		
	C.	Person of Ordinary Skill in the Art		
	D.	Clai	m Construction	9
IV.	Ground 1: Claims 1, 5-8, 15, and 19-22 are anticipated by O'Brien			9
	A.	O'Brien Overview (Ex. 1007)		
	B.	B. Independent claims 1 and 15		17
		1.	Preambles	17
		2.	[a] source resonator	17
		3.	[b] second resonator	20
		4.	[c] near-field wireless energy transfer	22
		5.	[d] field is shaped by conducting and magnetic material	24
	C.	Dep	endent claims 5-8 and 19-22 are anticipated by O'Brien	35
		1.	Claims 5-7 and claims 19-21 – multiple resonators	35
		2.	Claims 8, 22 – field shaped to avoid loss-inducing object	38
V.	Ground 2: Claims 1-23 would have been obvious over O'Brien in view of Haaster			41
	A.	Haaster (Ex. 1008) Overview4		
	В.	Motivation to combine O'Brien and Haaster		44



C.	Inde	pendent claims 1 and 15	51		
	1.	Preamble, Elements and steps [a], [b] and [c]	51		
	2.	[d] field is shaped by conducting and magnetic material	51		
D.	Depe	Dependent claims 2-14 and 16-22			
	1.	Claim 2-4 and 16-18 – quality factors > 100	54		
	2.	Claims 5-7, 19-21 – multiple resonators	59		
	3.	Claims 8, 22 – field shaped to avoid loss-inducing object	59		
	4.	Claim 9 – loss-inducing object completely covered by conducting and magnetic material	61		
	5.	Claim 10 – loss-inducing object partially covered	63		
	6.	Claim 11 – loss-inducing object nearer to source or second resonator	64		
	7.	Claim 12 – conducting material as first layer and magnetic material as second layer	66		
	8.	Claim 13 – partial covering by conducting and magnetic material	68		
	9.	Claim 14 – loss-inducing object is a mobile electronic device	69		
E.	Independent claim 23				
	1.	Preamble	71		
	2.	[a] resonator coupled to power and control circuitry	71		
	3.	[b] near-field wireless energy transfer	73		
	4.	[c] field is shaped by magnetic and conducting materials around power and control circuitry	73		
Seco	ndary	Considerations	75		
The	Roard	Should Reach the Merits of This Petition	75		



VI.

VII.

# Petition for Inter Partes Review of USP 8,304,935

VIII.	Mandatory Notices under 37 C.F.R. § 42.8		76
	A.	Real Party-in-Interest	76
	B.	Related Matters	76
	C.	Grounds for Standing	76
	D.	Lead and Backup Counsel and Service Information	76
	E.	Fee for Inter Partes Review	78
IX.	Conclusion		79



#### **TABLE OF AUTHORITIES**

Pag	ge(s)
CASES	
Apple Inc. v. Fintiv, Inc., IPR2020-00019, Paper 11 (P.T.A.B. Mar. 20, 2020)	75
Bruckelmyer v. Ground Heaters, Inc., 445 F.3d 1374 (Fed. Cir. 2006)	11
Cornell Univ. v. Hewlett-Packard Co., No. 01-CV-1974, 2008 U.S. Dist. LEXIS 39343 (N.D.N.Y. May 14, 2008)	, 12
<i>In re Hall</i> , 781 F.2d 897 (Fed. Cir. 1986)	11
In re Lister, 583 F.3d 1307 (Fed. Cir. 2009)	10
Net MoneyIN, Inc. v. VeriSign, Inc., 545 F.3d 1359 (Fed. Cir. 2008)	9
Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co. Ltd., 868 F.3d 1013 (Fed. Cir. 2017), cert. denied, 138 S. Ct. 1695 (2018)	9
United Patents Inc. v. Sound View Innovations, LLC, IPR2018-00599, Paper 11 (P.T.A.B. Sept. 10, 2018)	11
WiTricity Corp. v. Momentum Dynamics Corp., C.A. No. 20-1671-MSG	76
STATUTES	
35 U.S.C. § 102	2
35 U.S.C. § 102(a)	42
35 U.S.C. § 102(b)10	, 42
35 U.S.C. 8 102(e)	42



# DOCKET

# 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.

