

Apple Inc.
v.
Scramoge Technology Ltd.

IPR2022-00117, U.S. Patent No. 9,84

Patent Owner's Demonstrative Exhibits

February 9, 2023

Ex. 2021

Scramoge Technology Ltd.

DEMONSTRATIVE EXHIBITS
EVIDENCE

Grounds 1-2: No Plurality of Soft Magnetic Layer

Scramoge Technology Ltd.

Grounds 1-2, § 1

Grounds 1-2, § 2

Ground 2

DEMONSTRATIVE EXHIBIT
EVIDENCE

'215 Patent, Claim 1

1. A wireless charging and communication board, comprising:

- [1.1] **a plurality of soft magnetic layers comprising a first soft magnetic layer and a second soft magnetic layer**
- [1.2] a first polymeric material layer arranged on a first surface of the plurality of soft magnetic layers,
- [1.3] a second polymeric material layer arranged on a second surface of the plurality of soft magnetic layers, the second surface being opposed to the first surface; and
- [1.4] a coil pattern arranged on the second polymeric material layer,
- [1.5] wherein the plurality of soft magnetic layers are positioned between the first polymeric material layer and the second polymeric material layer,
- [1.6] wherein the first polymeric material layer includes a first extending portion extending longer than the second surface of the plurality of soft magnetic layers,
- [1.7] wherein the second polymeric material layer includes a second extending portion extending longer than the first surface of the plurality of soft magnetic layers,
- [1.8] wherein the first extending portion and the second extending portion are connected to each other,
- [1.9] wherein at least one of the first soft magnetic layer or the second soft magnetic layer is made of an amorphous alloy, a crystalline alloy, an amorphous alloy ribbon, a nanocrystalline alloy, or a silicon steel plate.

'215 Patent, Claim 1

Summary of Why Petition Fails

- Petition relies on Sawa (U.S. Patent No. 9,443,648), *inter alia*, on all grounds.
- Sawa discloses two magnetic sheets.
- Sawa teaches that the sheets are of two different “kinds” because they exhibit different magnetic characteristics.
- In order to be “hard to saturate” in the presence of a permanent magnet, Sawa’s first magnetic sheet is of a different material composition than the second magnetic sheet, is manufactured differently than the second magnetic sheet, and is significantly thicker than the second magnetic sheet.

The Petition Inadequately Analyzes

- Petition identifies the first magnetic thin plate of Sawa as the “first soft magnetic layer” of the claims of the ’215 Patent.
- Petition identifies the second magnetic thin plate of Sawa as satisfying the “second soft magnetic layer” of the claims of the ’215 Patent.
- Petition relies on Sawa’s disclosure that the inclusion of silicon as part of the material composition of the first magnetic thin plate renders obvious that the composition is a soft magnetic material.
 - “[E]ach magnetic plate may include silicon (Si), where ‘Si is an element effective for control of a soft magnetic characteristic.’” Petition (citing Sawa at 9:56-10:1).

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