UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.,
Patent Owner

IPR2022-00117 Patent 9,843,215

PATENT OWNER'S PRELIMINARY RESPONSE

Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



Table of Contents

I.	INTRO	DUCT	ION	1
II.	THE PA	ATENT	TED TECHNOLOGY	2
	A.	The '	215 Patent Was Invented by LG Innotek	2
	В.	Overv	riew of the '215 Patent	2
	C.	Challe	enged '215 Patent Independent Claims	5
III.	OVERV	/IEW (OF ASSERTED REFERENCES	6
	A.		(Ex. 1005)—the primary reference—does not disclose the ed invention	6
	В.		Ex. 1006)—a secondary reference—does not compensate for ficiencies of Sawa	9
	C.		(Ex. 1007)—a tertiary reference—does not compensate for the es of Sawa or Park	
IV.			HAS NOT ESTABLISHED A REASONABLE LIKELIHOOD ITY OF THE CHALLENGED CLAIMS	
	A.	Groun Obvid	ad 1: Claims 1, 8–11, 13, 17, and 19–21 Are Not Rendered ous by the Combination of Sawa and Park	9
		1.	The Petition asserts that Sawa alone discloses these claim limitations—the Petition does not assert any combination of references or articulate any modifications to Sawa	1
		2.	Sawa does not disclose [1.2 and 13.3] "a first polymeric material layer" and [1.3 and 13.4] "a second polymeric materia layer," [1.8 and 13.9] "wherein the first extending portion and the second extending portion are connected to each other." 1	
			a. Claims 1 and 13 require two separate and distinct polymeric material layers	3
			b. Sawa does not disclose "a first polymeric material layer" and a "second polymeric material layer"	,



		polymeric material layer indextending longer than the partial [1.7] and [13.8] "wherein the includes a second extending plurality of soft magnetic la	and [13.7] "wherein the first cludes a first extending portion lurality of soft magnetic layers" or the second polymeric material layer g portion extending longer than the eyers."
		b. Sawa does not disclose	the claimed "extending25
	В.	· · · · · · · · · · · · · · · · · · ·	2 Are Not Rendered Obvious by the
V.	ALL FI	<i>NTIV</i> FACTORS WEIGH AGAIN	ST INSTITUTION 28
	A.	<u>Factor 1</u> : The district court has no evidence that a stay will be grante	t granted a stay, nor is there any d
	В.	<u>Factor 2</u> : The district court trial w final decision in this proceeding.	ill occur before the deadline for a
	C.	the court will have nearly complet	n decision is reached, the parties and ted claim construction and discovery
	D.		up between this IPR and the district
	Ε.	<u>Factor 5</u> : Petitioner is a defendant	in the district court litigation 37
	F.	<u>Factor 6</u> : The petition is without n	nerit and unlikely to succeed 37
VI	CONCI	LISION	40



PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Notice of IPR Petitions, <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA, Dkt. No. 35 (W.D. Tex. Nov. 11, 2021)
2002	Scheduling Order, <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA, Dkt. No. 33 (W.D. Tex. Sept. 28, 2021)
2003	Law360 Article: West Texas Judge Says He Can Move Faster Than PTAB
2004	Text Order Denying Motion to Stay Pending IPR, Solas OLED Ltd. v. Google, Inc., Case No. 6:19-cv-00515-ADA (W.D. Tex. June 23, 2020)
2005	Order Denying Motion to Stay Pending IPR, <i>Multimedia Content Management LLC v. DISH Network L.L.C.</i> , Case No. 6:18-cv-00207-ADA, Dkt. No. 73 (W.D. Tex. May 30, 2019)
2006	Scheduling Order, Correct Transmission LLC v. Adtran, Inc., Case No. 6:20-cv-00669-ADA, Dkt. No. 34 (W.D. Tex. Dec. 10, 2020)
2007	Scheduling Order, <i>Maxell Ltd. v. Amperex Technology Ltd.</i> , Case No. 6:21-cv-00347-ADA, Dkt. No. 37 (W.D. Tex. Nov. 8, 2021)
2008	Standing Order Governing Proceedings in Patent Cases, Judge Alan D. Albright
2009	Claim Construction Order, <i>Solas OLED Ltd. v. Apple Inc.</i> , Case No. 6:19-cv-00537-ADA, Dkt. No. 61 (W.D. Tex. Aug. 30, 2020)
2010	Plaintiff Scramoge Technology Ltd.'s Amended Preliminary Disclosure of Asserted Claims and Infringement Contentions to Apple Inc. in <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA (W.D. Tex.)



2011	Defendant Apple Inc.'s First Amended Preliminary Invalidity Contentions in <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA (W.D. Tex.)
2012	Android Authority article: LG Innotek's Latest wireless charger is Three times faster
2013	Scheduling Order, <i>Scramoge Technology Ltd. v. Google LLC</i> , Case No. 6:21-cv-00616-ADA, Dkt. No. 28 (W.D. Tex. Nov. 15, 2021)
2014	Defendants' Joint Reply Claim Construction Brief in <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA (W.D. Tex.)
2015	Scheduling Order, <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA, Dkt. No. 56 (W.D. Tex. Feb. 11, 2022)



DOCKET A L A R M

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.

