

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

SCRAMOGE TECHNOLOGY, LTD.,
Patent Owner

IPR2022-00118
U.S. Patent No. 10,804,740

**PETITIONER'S OPPOSITION TO PATENT OWNER'S
REVISED MOTION TO AMEND**

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PETITIONER'S EXHIBIT LIST

Ex.1001	U.S. Patent No. 10,804,740
Ex.1002	Prosecution History of U.S. Patent No. 10,804,740
Ex.1003	Declaration of Dr. Joshua Phinney under 37 C.F.R. § 1.68
Ex.1004	<i>Curriculum Vitae</i> of Dr. Joshua Phinney
Ex.1005	U.S. Patent Application Publication No. 2009/0021212 to Hasegawa et al.
Ex.1006	U.S. Patent Application Publication No. 2007/0069961 to Akiho et al.
Ex.1007	U.S. Patent Application Publication No. 2014/0306656 A1 Tabata et al.
Ex.1008	U.S. Patent No. 8,384,263 B2 to Hiramatsu et al.
Ex.1009	Reserved
Ex.1010	Reserved
Ex.1011	Reserved
Ex.1012	Reserved
Ex.1013	Reserved
Ex.1014	Reserved
Ex.1015	Scheduling Order, <i>Scramoge Technology Limited v. Apple Inc.</i> , WDTX-6-21-cv-00579 (filed Sept. 28, 2021)
Ex.1016	Plaintiff's Preliminary Disclosure of Asserted Claims and Infringement Contentions to Apple Inc., <i>Scramoge Technology Limited v. Apple Inc.</i> , WDTX-6-21-cv-00579 (served Sept. 7, 2021)
Ex.1017	U.S. Patent Publication Application No. 2008/0164840 to Kato et al.

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Ex.1018	Supplemental Declaration of Dr. Joshua Phinney under 37 C.F.R. § 1.68
Ex.1019	<i>The Merriam-Webster Dictionary</i> , Merriam-Webster, Inc., 1995.
Ex.1020	The Wayback Machine, capture of “Separate Define Separate at Dictionary.com” on February 7, 2012, https://web.archive.org/web/20120207103735/http://dictionary.reference.com:80/browse/separate
Ex.1021	Second Supplemental Declaration of Dr. Joshua Phinney under 37 C.F.R. § 1.68
Ex.1022	U.S. Patent No. 9,178,369
Ex.1023	U.S. Patent No. 8,421,574 to Suzuki et al.

I. INTRODUCTION

Patent Owner filed a Revised Motion to Amend (“Revised Motion,” Paper 28) with substitute claims 21, 22, and 23. The Revised Motion should be denied because Patent Owner’s substitute claims are no more novel than the original claims or the substitute claims in its original Motion to Amend. The Kato reference again renders obvious Patent Owner’s added limitations as well as the original limitations under 35 U.S.C. § 103.

II. SUBSTITUTE CLAIMS 21-23 ARE UNPATENTABLE AS OBVIOUS UNDER 35 U.S.C. § 103

The Board should deny Patent Owner’s Revised Motion because substitute claims 21-23 are obvious in view of Kato (Ex.1017).

A. Kato Renders Obvious Substitute Claims 21-23

1. Substitute Claim 21

[21.0] *A wireless power receiver, comprising:*

To the extent the preamble is limiting, Kato discloses a wireless power receiver. Like the '740 patent, Kato discloses “a noncontact power-transmission coil for use in power transmission in a noncontact manner using electromagnetic induction.” Ex.1017, [0003]. Fig. 3 of Kato, annotated below, illustrates a mobile phone unit 2 having a “secondary power-transmission coil 21” (*wireless power receiver*) that wirelessly receives power from “primary power-transmission coil 10” within a cradle 1. Ex.1017, [0049]-[0052], [0058] (“[W]hen an alternating

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