### UNITED STATES PATENT AND TRADEMARK OFFICE

\_\_\_\_\_

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

\_\_\_\_\_

APPLE INC., Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.,
Patent Owner

\_\_\_\_\_

IPR2022-00118 Patent 10,804,740

\_\_\_\_\_

### PATENT OWNER'S PRELIMINARY RESPONSE

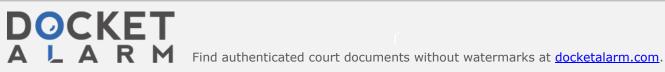
Mail Stop "PATENT BOARD"

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	TON 1		
II.	THE PA	ATENT	ΓED TECHNOLOGY2		
	A.	The '	740 Patent Was Invented by LG Innotek		
	В.	Overv	view of the '740 Patent		
	C.	Chall	enged '740 Patent Independent Claims		
III.	OVERV	/IEW (	OF ASSERTED REFERENCES		
	A.		gawa (Ex. 1005)—the only reference applied in Ground 1—does sclose the claimed invention		
IV.			HAS NOT ESTABLISHED A REASONABLE LIKELIHOOD ITY OF THE CHALLENGED CLAIMS8		
	A.	The Petition asserts that Hasegawa alone discloses these claim limitations—the Petition does not assert any combination of references or articulate any modifications to Hasegawa			
	В.	receiv layer'	gawa does not disclose [6.5] "a connecting unit overlapping the ving space in a vertical direction perpendicular to the adhesive and [16.5] "a connecting unit disposed corresponding to the ving space"		
		1.	Claims 6 and 16 require a distinct "connecting unit" 11		
		2.	Hasegawa does not disclose a separate and distinct "connecting unit"		
			a. Hasegawa's lead lines are part of the coil		
			b. Hasegawa's connection pads and wiring pattern are part of the substrate		
		3.	Hasegawa does not render obvious the '740 Patent's "connecting unit"		
V.	ALL FI	NTIV	FACTORS WEIGH AGAINST INSTITUTION27		



	A.	Factor 1: The district court has not granted a stay, nor is there any evidence that a stay will be granted
	В.	Factor 2: The district court trial will occur before the deadline for a final decision in this proceeding
	C.	Factor 3: By the time an institution decision is reached, the parties and the court will have nearly completed claim construction and discovery will be underway
	D.	Factor 4: There is complete overlap between this IPR and the district court proceedings
	E.	Factor 5: Petitioner is a defendant in the district court litigation 36
	F.	Factor 6: The petition is without merit and unlikely to succeed 37
VI	CONCI	LUSION 37



## 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 Scramoge Technology Ltd. v. Apple Inc., 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.

