

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

SCRAMOGE TECHNOLOGY LTD.,

Patent Owner.

Case IPR2022-00118

Patent 10,804,740

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

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I. INTRODUCTION

Petitioner argues that the substitute claims are obvious under 35 U.S.C. § 103 over a single reference, U.S. Patent Publication Application No. 2008/0164840 (“Kato”) without showing how or why one skilled in the art would modify Kato to arrive at the claimed invention. The Board should therefore grant Patent Owner’s contingent Revised Motion to Amend (Paper 28) and substitute original claims 6, 16, and 17 of U.S. Patent No. 10,804,740 (the “’740 Patent”) with substitute claims 21, 22, and 23, respectively, if the original claims of the ’740 Patent are found unpatentable.

II. Legal standard – 35 U.S.C. § 103 Obviousness

Petitioner has the burden of showing that the amended claims are unpatentable over the prior art by a preponderance of the evidence. 37 C.F.R. § 42.121(d)(2); *Aqua Products Inc. v. Matal*, 872 F.3d 1290, 1324 (Fed. Cir. 2017) (*en banc*). When alleging that claims of a patent are obviousness over a single prior art reference, Petitioner must explain how and why one skilled in the art would “modify that reference to arrive at the claimed invention.” *ARENDI SARL v. Apple Inc.*, 832 F. 3d 1355, 1361 (Fed. Cir. 2016) (citing *K/S Himpp v. Hear-Wear Techs., LLC*, 751 F.3d 1362 (Fed. Cir. 2014)).

III. Overview of the ’740 Patent.

As explained in Patent Owner’s Response (Paper 17 at p. 2-5), the ’740 Patent teaches a wireless power receiver that uses a discrete connecting unit to interconnect the coil of the wireless power receiver to a separate circuit. Ex. 1001, 5:30-33, *see, e.g.*, Figs. 26-28. The ’740 Patent provides that the overall thickness

of the wireless power receiver (1000) can be reduced by as much as the thickness of the connecting unit (300) with an adhesive layer (710) having a receiving space (130) configured to receive at least a portion of the thickness of connecting unit. *Id.*, 1:20-2:53; 8:50-54; 16:4-13; 18:46-53; Figs. 26-28. 1:20-2:53. As shown in, e.g., Fig. 28, the adhesive layer (710) has an upper surface and a lower surface (*top planer surface and opposite bottom planer surfaces*) that generally define the thickness of the adhesive layer. The adhesive layer (710) has a portion cut out therefrom, which is identified as the receiving space (130), that disrupts the otherwise continuous adhesive layer (710). The receiving space (130) extends outward from the inside of the coil (220/320) so that the interconnection at the outside of the coil (at 210/310) falls within the boundary of the receiving space when viewed from the top. *See id.*, Fig. 26-27.

IV. U.S. Patent Pub. No. 2008/0164840 (“Kato”).

Kato is directed to a “noncontact power-transmission coil [that] includes a planar coil and a printed-circuit board. The planar coil is formed by spirally winding a linear conductor made of a single or twisted wire in a substantially same plane.” Ex. 1017, Abstract. Kato’s disclosure provides only for the planar coil to be adhered to the flexible printed-circuit board when the noncontact power-transmission coil is fully assembled. *Id.* at [0034], [0043], [0065-66], [0080-82], [0097] (all explaining that the planar coil is “stuck” to the flexible circuit board). Kato consistently teaches that the adhesion sheets 41, 42, 43 cover the entirety of the planar portion of the coil to which the adhesion sheets are attached. *Id.*, [0065],

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