

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 REPLY
TO PATENT OWNER'S RESPONSE**

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PETITIONER'S EXHIBIT LIST

Ex.1001	U.S. 10,804,740
Ex.1002	Prosecution History of U.S. 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 2009/0021212 (Hasegawa)
Ex.1006	U.S. Patent Application Publication 2007/0069961
Ex.1007	U.S. Patent Application Publication 2014/0306656 A1 Tabata et al
Ex.1008	U.S. Patent 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 No. 2008/0164840 to Kato et al.
Ex.1018	Supplemental Declaration of Dr. Joshua Phinney under 37 C.F.R. § 1.68

Ex.1019	<i>The Merriam-Webster Dictionary, Merriam-Webster, Inc., 1995.</i>
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

I. INTRODUCTION

Patent Owner's entire argument for why Hasegawa does not render the challenged claims obvious hinges on its assertion that the claimed connecting unit must be "separate and discrete" from the other components of the claimed wireless power receiver. But neither the claims nor the intrinsic record contains any such requirement. Patent Owner's arguments to the contrary commit the "cardinal sin" of reading the embodiments described in the specification into the claims and therefore fail.

Because each of Patent Owner's arguments is premised on incorrect claim constructions, its Response fails to rebut the *prima facie* case of obviousness presented in the Petition. Accordingly, Petitioner respectfully requests that the Board find each of the challenged claims unpatentable.

II. PATENT OWNER'S PROPOSED CLAIM CONSTRUCTION UNDULY LIMITS THE CLAIMS

Patent Owner asks the Board to construe the challenged claims to require that the claimed "connecting unit" be "separate and distinct" from the "coil unit"—which it contends includes a "coil," a "first connection terminal," and a "second connection terminal"—because embodiments described in the specification include "coil units" that are purportedly "distinct" from the connecting units described in those embodiments. Patent Owner's Response ("Response," Paper 17), 8. But the

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