

Apple Inc.
v.
Scramoge Technology Ltd.

IPR2022-00120, U.S. Patent No. 9,997

Patent Owner's Demonstrative Exhibits

February 2, 2023

Ex. 2020

Scramoge Technology Ltd.

Grounds 1-3: Not Obvious to Combine Suzuki

Scramoge Technology Ltd.

Grounds 1-3

Ground 2

'962 Patent, Claim 1

1. A wireless power receiving antenna comprising:

[1.1] a substrate;

[1.2] a soft magnetic layer comprising a first magnetic sheet disposed on the substrate and a second magnetic sheet disposed on the first magnetic sheet;

[1.3] a receiving coil disposed on the second magnetic sheet; and

[1.4] an adhesive layer formed between the second magnetic sheet and the receiving coil

[1.5] ***wherein the adhesive layer includes a first adhesive layer in contact with the second magnetic sheet, a second adhesive layer in contact with the receiving coil, and an insulating layer between the first adhesive layer and the second adhesive layer,*** and

[1.6] wherein a height of a highest position of the second magnetic sheet from the substrate is greater than a height of a lowest position of the receiving coil from the substrate.

'962 Patent, C

Summary of Why Petition Fails

- Petition relies on combination of Suzuki (U.S. Patent No. 8,421,611) and Lee (U.S. Patent No. 9,252,611), *inter alia*, for all grounds.
- Petition focuses on the structure of Lee's double-sided tape but not in Suzuki, not the composition of the tape that POSITA would be motivated to look to .
- Because Suzuki already uses integrated adhesives, POSITA would not recognize no benefit in using Lee's double-sided tape.
- The combination's drawbacks would outweigh any possible benefits.
- Clearly a case of hindsight.

Petition's Approach to Suzuki/Lee Comb

- As to limitation [1.4], “Suzuki teaches that an adhesive is used to connect the coil 170 to the magnetic layer 171.” Petition at 38 (citing Suzuki at 8:8-10).
- For limitation [1.5], Petition reiterates that “Suzuki generally teaches the use of an adhesive to connect the coil 170 to the magnetic layer 171.” Petition at 38 (repeating cite to Suzuki at 8:8-10).
- Petition pivots exclusively to Lee's use of double-sided tape to connect the coil to a magnetic layer to conclude that a POSITA would find it obvious to use the double-sided tape to connect Suzuki's coil 170 to the magnetic layer 171.

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