

*Apple Inc.*  
v.  
*Scramoge Technology Ltd.*

IPR2022-00120, U.S. Patent No. 9,99

Patent Owner's Demonstrative Exhibits

February 2, 2023

Ex. 2020

Scramoge Technology Ltd.

DEMONSTRATIVE EXHIBIT

# Grounds 1-3: Not Obvious to Combine Suzu

Scramoge Technology Ltd.

Grounds 1-3

Ground 2

DEMONSTRATIVE EXHIBIT

## '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

## Summary of Why Petition Fails

- Petition relies on combination of Suzuki (U.S. Patent No. 8,411,111) 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 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 Com

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

# 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.