Apple Inc.

V.

Scramoge Technology Ltd.

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

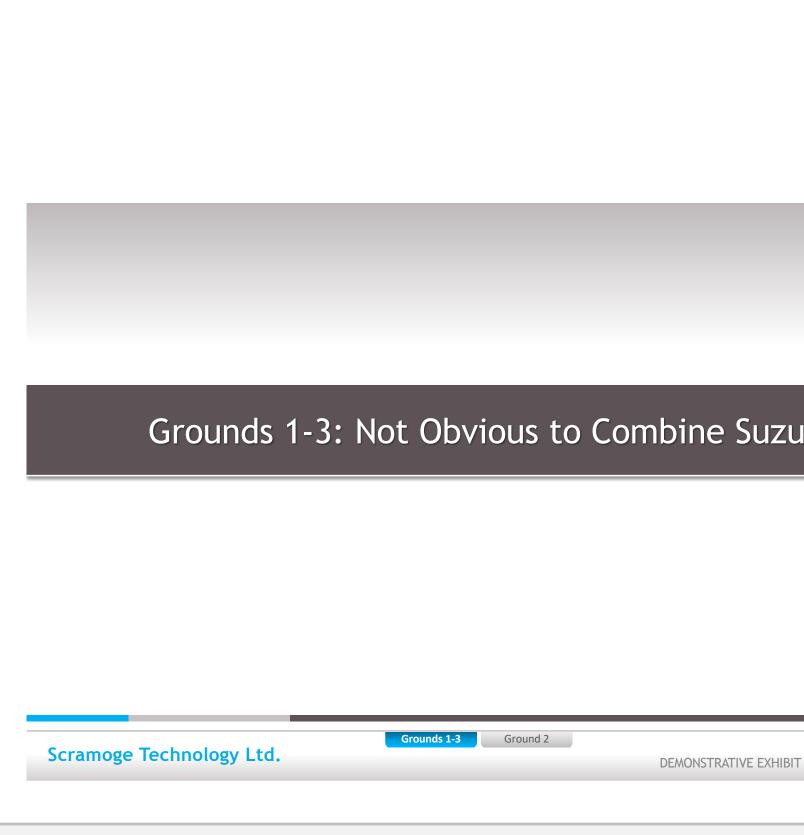
Patent Owner's Demonstrative Exhibits

February 2, 2023

Ex. 2020

Scramoge Technology Ltd.





## '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 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
  - [1.5] wherein the adhesive layer includes a first adhesive layer in contact with the se sheet, a second adhesive layer in contact with the receiving coil, and an insulating labetween 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 sul than a height of a lowest position of the receiving coil from the substrate.

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**Grounds 1-3** 

Ground 2



## Summary of Why Petition Fails

- Petition relies on combination of Suzuki (U.S. Patent No. 8,2
  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 woul motivated to look to .
- Because Suzuki already uses integrated adhesives, POSITA w recognize no benefit in using Lee's double-sided tape.
- The combination's drawbacks would outweigh any possible !
- Clearly a case of hindsight.

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Grounds 1-3

Ground 2



## 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 generate the use of an adhesive to connect the coil 170 to the mage 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.

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Grounds 1-3

Ground 2



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