UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner

v. SCRAMOGE TECHNOLOGY, LTD., Patent Owner

> IPR2022-00120 U.S. Patent No. 9,997,962

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I.	INTR	ODUCTION1		
II.	FOU	PETITION ESTABLISHES THAT A POSITA WOULD HAVE ND IT OBVIOUS TO COMBINE SUZUKI AND LEE DUNDS 1-3)		
	A.	Suzuki itself suggests the very combination proposed in the petition		
	1.	Suzuki teaches using pressure sensitive adhesive, which a POSITA would recognize as tape		
	2.	Suzuki teaches placing an insulating layer and adhesive between its secondary coil and magnetic layer		
	3.	Suzuki teaches toward the combination, not away from it		
	B.	The evidence shows that using double-sided tape as proposed was a commonly accepted, predictable, and obvious solution		
III.	FOUI	PETITION ESTABLISHES THAT A POSITA WOULD HAVE ND IT OBVIOUS TO COMBINE SAWA WITH SUZUKI AND (GROUND 2)		
	А.	Patent Owner's "magnetostriction" argument is baseless and illogical		
	1.	Suzuki utilizes Fe-Ni, one of Sawa's allegedly harmful alloys 16		
	2.	Sawa illustrates that POSITAs were able to control an alloy's magnetostriction		
	В.	Suzuki expressly motivates a POSITA to utilize materials like Fe- Ni for its magnetic layer		
IV.	CON	CLUSION		

CERTIFICATE OF SERVICE

PETITIONER'S EXHIBIT LIST

Ex.1001	U.S. 9,997,962
Ex.1002	Prosecution History of U.S. 9,997,962
Ex.1003	Declaration of Joshua Phinney under 37 C.F.R. § 1.68
Ex.1004	Curriculum Vitae of Joshua Phinney
Ex.1005	U.S. Patent No. 8,421,574 to Suzuki et al.
Ex.1006	U.S. Patent No. 9,252,611 to Lee
Ex.1007	U.S. Patent No. 8,922,162 to Park
Ex.1008	U.S. Patent No. 9,443,648 to Sawa
Ex.1009	U.S. Patent Application Pub. No. 2014/0315016
Ex.1010	U.S. Patent No. 8,427,100
Ex.1011	U.S. Patent No. 8,687,536
Ex.1012	U.S. Patent No. 7,161,650
Ex.1013	U.S. Patent No. 9,360,456
Ex.1014	U.S. Patent No. 9,667,086
Ex.1015	Scheduling Order, <i>Scramoge Tech. Ltd. 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 Tech. Ltd. v.</i> <i>Apple Inc.</i> , WDTX-6-21-cv-00579 (served Sept. 7, 2021)
Ex.1017	U.S. Patent No. 9,306,411
Ex.1018	Websters II New College Dictionary: Third Edition, (2005)
Ex.1019	Deposition Transcript of Dr. David Ricketts (Oct. 5, 2022)

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Ex.1020	Costantino Creton, "Pressure-Sensitive Adhesives: An Introductory Course," MRS Bulletin, Volume 28, Issue 6, June 2003, pp. 434 – 439, available at https://www.cambridge.org/core/journals/mrs- bulletin/article/abs/pressuresensitive-adhesives-an-introductory- course/192A601FA28683A72F98DB5A391E10DB
Ex.1021	U.S. Patent No. 9,440,416
Ex.1022	U.S. Patent No. 8,383,092
Ex.1023	Google.com, "About cambridge.org/core/journals/mrs- bulletin/article/abs/pressuresensitive-adhesives-an-introductory- course/192A601FA28683A72F98DB5A391E10DB," available at https://www.google.com/search?q=About+https:%2F%2Fwww.ca mbridge.org%2Fcore%2Fjournals%2Fmrs- bulletin%2Farticle%2Fpressuresensitive-adhesives-an- introductory- course%2F192A601FA28683A72F98DB5A391E10DB&tbm=ilp& ilps=ADNMCi1X0jhIJM6C5hacfsMwT58hldSB9w&hl=en- US&biw=1920&bih=1057&dpr=1, accessed 10.18.22
Ex.1024	Kurt Schramer, "Pressure-Sensitive Adhesives 101," ASI Magazine, October 1, 2009, available at https://www.adhesivesmag.com/articles/88511-pressure-sensitive- adhesives-101
Ex.1025	The Wayback Machine, capture of "Feature Article – Adhesives & Sealants Industry" on 10.29.2009, https://web.archive.org/web/20091029000228/http://www.adhesive smag.com/Articles/Feature_Article
Ex.1026	Google.com, "About adhesivesmag.com/articles/88511-pressure- sensitive-adhesives-101," available at https://www.google.com/search?q=About+https:%2F%2Fwww.adh esivesmag.com%2Farticles%2F88511-pressure-sensitive- adhesives- 101&tbm=ilp&ilps=ADNMCi19IKxi4Y1zFxERnIEP5IGRevL2A Q&hl=en-US&biw=1920&bih=1057&dpr=1, accessed 10.18.22
Ex.1027	Pizzi, A. and Mittal, K. L., Handbook of Adhesive Technology,

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