UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC., Petitioner,

v.

SCRAMOGE TECHNOLOGY LTD., Patent Owner

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

PATENT OWNER'S SUR-REPLY

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I.	Iı	ntroc	luction		
II.			nds 1-3 fail because the Petition does not properly motivate its proposed ination of Suzuki with Lee		
P	١.		zuki does not teach using pressure sensitive adhesive between the gnetic layer 171 and the secondary coil 170		
E	3.		zuki does not teach placing an insulating layer between the magnetic layer 1H and the secondary coil 170		
		1.	Petitioner relies on new arguments, not in the Petition, to explain how Suzuki purportedly discloses a motivation to combine Suzuki with Lee 6		
		2.	Petitioner's new arguments still do not disclose a motivation to combine Suzuki with Lee		
C. Because a POSITA could have combined double-sided tape with S does not mean they would have been motivated to do so					
III.			nd 2 additionally fails because a POSITA would not have been motivated nbine Sawa with Suzuki and Lee		
IV.	C	onc	lusion		

Table of Authorities

<u>Cases</u>

Acceleration Bay, LLC v. Activision Blizzard Inc., 908 F.3d 765 (Fed. Cir. 2018)
<i>Belden Inc. v. Berk-Tek LLC</i> , 805 F.3d 1064 (Fed. Cir. 2015)15
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<i>In re Magnum Oil Tools Int'l, Ltd.</i> , 829 F.3d 1364 (Fed. Cir. 2016)
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<i>Tech. Licensing Corp. v. Videotek, Inc.</i> , 545 F.3d 1316 (Fed. Cir. 2008))
Statutes
35 U.S.C. § 312(a)(3)
37 C.F.R. § 42.23(b)

Exhibits

Exhibit No.	Description
2001	Notice of IPR Petitions, Scramoge Technology Ltd. v. Apple Inc.,
	Case No. 6:21-cv-00579-ADA, Dkt. No. 35 (W.D. Tex. Nov. 11,
	2021)
2002	Scheduling Order, Scramoge Technology Ltd. v. Apple Inc., Case
	No. 6:21-cv-00579-ADA, Dkt. No. 33 (W.D. Tex. Sept. 28,
	2021)
2003	Law360 Article: West Texas Judge Says He Can Move Faster
	Than PTAB
2004	Text Order Denying Motion to Stay Pending IPR, Solas OLED
	Ltd. v. Google, Inc., Case No. 6:19-cv-00515-ADA (W.D. Tex.
	June 23, 2020)
2005	Order Denying Motion to Stay Pending IPR, Multimedia Content
	Management LLC v. DISH Network L.L.C., Case No. 6:18-cv-
	00207-ADA, Dkt. No. 73 (W.D. Tex. May 30, 2019)
2006	Scheduling Order, Correct Transmission LLC v. Adtran, Inc.,
	Case No. 6:20-cv-00669-ADA, Dkt. No. 34 (W.D. Tex. Dec. 10,
	2020)
2007	Scheduling Order, Maxell Ltd. v. Amperex Technology Ltd., Case
	No. 6:21-cv-00347-ADA, Dkt. No. 37 (W.D. Tex. Nov. 8, 2021)
2008	Standing Order Governing Proceedings in Patent Cases, Judge
	Alan D. Albright
2009	Claim Construction Order, Solas OLED Ltd. v. Apple Inc., Case
	No. 6:19-cv-00537-ADA, Dkt. No. 61 (W.D. Tex. Aug. 30,
	2020)
2010	Plaintiff Scramoge Technology Ltd.'s Amended Preliminary
	Disclosure of Asserted Claims and Infringement Contentions to
	Apple Inc. in Scramoge Technology Ltd. v. Apple Inc., Case No.
	6:21-cv-00579-ADA (W.D. Tex.)
2011	Defendant Apple Inc.'s First Amended Preliminary Invalidity
	Contentions in Scramoge Technology Ltd. v. Apple Inc., Case
	No. 6:21-cv-00579-ADA (W.D. Tex.)
2012	Android Authority article: LG Innotek's Latest wireless charger
	is Three times faster
2013	Scheduling Order, Scramoge Technology Ltd. v. Google LLC,
	Case No. 6:21-cv-00616-ADA, Dkt. No. 28 (W.D. Tex. Nov. 15,
	2021)

2014	Defendants' Joint Reply Claim Construction Brief in Scramoge Technology Ltd. v. Apple Inc., Case No. 6:21-cv-00579-ADA (W.D. Tex.)
2015	Scheduling Order, <i>Scramoge Technology Ltd. v. Apple Inc.</i> , Case No. 6:21-cv-00579-ADA, Dkt. No. 56 (W.D. Tex. Feb. 11, 2022)
2016	Declaration of David S. Ricketts, Ph.D.
2017	Curriculum Vitae of David S. Ricketts, Ph.D.
2018	July 14, 2022 Deposition Transcript of Joshua Phinney, Ph.D.
2019	Declaration of John Petrsoric in Support of Motion for Admission <i>Pro Hac Vice</i>

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