

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

SCRAMOGE TECHNOLOGY, LTD.,
Patent Owner

IPR2022-00350
U.S. Patent No. 9,806,565

**SUPPLEMENTAL DECLARATION OF JOSHUA PHINNEY, PH.D.,
UNDER 37 C.F.R. § 1.68**

TABLE OF CONTENTS

A.	Introduction.....	3
B.	A POSITA would have found substitute claims 21-23 obvious over Goma in view of Park.....	4
a.	Summary of Goma	4
b.	Summary of Park.....	6
c.	Detailed Analysis	7
C.	Declaration.....	34

I, Joshua Phinney, Ph.D., declare:

A. Introduction

1. I am making this supplemental declaration at the request of Apple Inc. in the matter of the *Inter Partes* Review IPR2022-00350 of U.S. Patent No. 9,806,565 (the “565 Patent”) to An et al. The terms of my engagement, my background and qualifications, prior testimony, and the legal standards and claim constructions that I am applying are set forth in my previous CV and declaration. See Ex.1003; Ex.1004.

2. In the preparation of this declaration, I have studied the materials noted in my previous declaration, as well as the following additional materials:

(1) **Ex.1023** – Certified English Translation of Japanese Patent Publication JP2011-210937 to Goma et al. (“Goma”), Japanese Language Version of JP2011-210937, and the Translation Certificate.

3. In forming the opinions expressed below, I have considered:

(1) the documents listed above; the relevant legal standards, including the standard for obviousness, and any additional authoritative documents as cited in the body of this declaration; and my own knowledge and experience, including my work experience in the field of wireless charging, as described below.

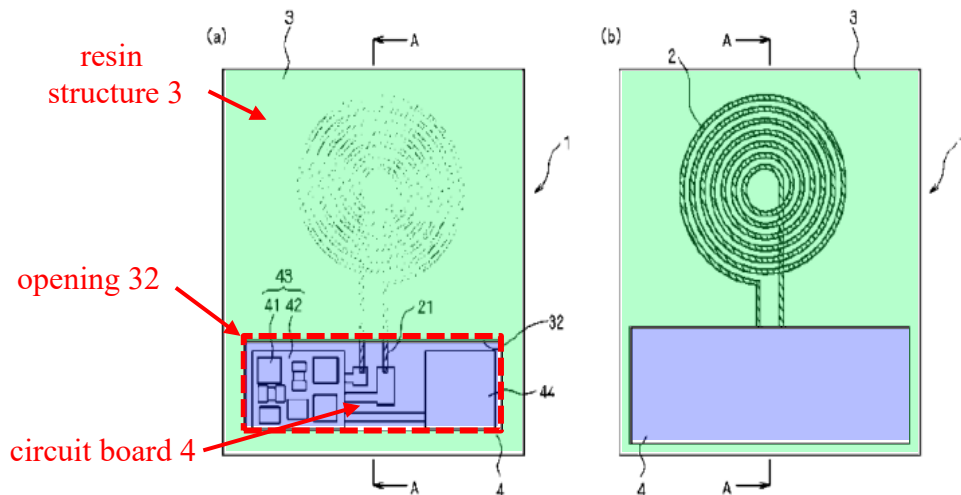
B. A POSITA would have found substitute claims 21-23 obvious over Goma in view of Park.

4. I have been asked to provide my opinion as to whether Substitute Claims 21, 22, and 23 in Patent Owner’s Motion to Amend (“Motion,” Paper 18) would have been obvious in view of prior art. The discussion below provides a detailed analysis of how JP2011-210937 to Goma et al. (“Goma,” Ex.1023) in view of U.S. Patent No. 8,922,162 to Park et al. (“Park,” Ex. 1006) renders obvious the limitations of the substitute claims.

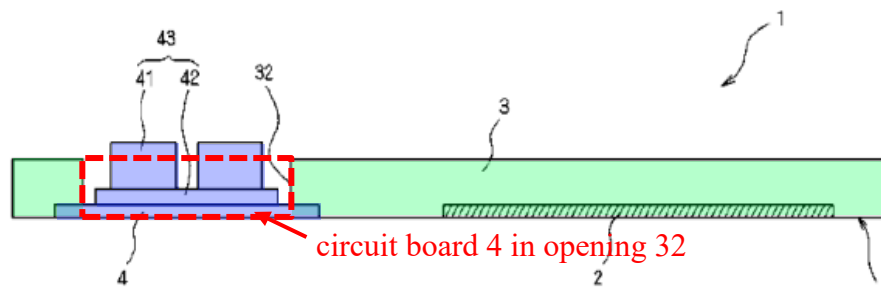
a. Summary of Goma

5. Like the ’565 Patent, Goma relates to a “coil module for contactless power transmission” for electronic devices. Ex.1023, [0002]. Goma also describes that its “coil module” may be used in “electronic devices such as communication devices.” *Id.* at [0001]-[0002].

6. Figs. 1 and 2 of Goma, reproduced and annotated below, illustrate a coil module 1 having a “resin structure 3” that includes an “opening 32” of a rectangular shape to receive a rectangular “circuit board 4.” *Id.* at [0031], [0037]. The resin structure 3 and the opening 32 are formed by a “mold” with a specific shape. *Id.* at [0039]. Goma teaches that the “coil 2 is formed into a coil” or spiral shape with a “conductor such as a copper wire” disposed on and within the “resin structure 3”. *Id.* at [0032].



Ex.1023, Fig. 1 (annotated)



Ex.1023, Fig. 2 (annotated)

Additionally, as shown in Fig. 1 above, Goma’s circuit board 4 is disposed in the opening 32 and is connected to the wires 21 of the coil 2. The coil 2 is disposed on the resin structure 3, and the wire 21 of the coil 2 is connected to the circuit board 4. Additionally, Goma’s circuit board 4 overlaps the opening 32 and extends in a second direction parallel to the upper surface of the resin structure 3. These components of the “coil module 1” provide “contactless power transmission” in an “electronic device on the power receiving side.” *Id.* at [0001]-[0002]. Therefore,

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