

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner

v.

SCRAMOGE TECHNOLOGY, LTD.,  
Patent Owner

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

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

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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 declarations. See Ex.1003; Ex.1004; Ex.1024.

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

- (1) **Ex.1025** – Certified English Translation of Japanese Patent Publication H4-51115 to Motoharu et al. (“Motoharu”), Japanese Language Version of H4-51115, and the Translation Certificate, and
- (2) **Ex.1027** –U.S. Patent Publication No. 2007/0069961 to Akiho et al. (“Akiho”).

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

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

4. I have been asked to provide my opinion as to whether Substitute Claims 21, 22, and 23 in Patent Owner’s Revised Motion to Amend (“Motion,” Paper 25) would have been obvious in view of prior art. The discussion below provides a detailed analysis of how U.S. Patent No. 8,922,162 to Park et al. (“Park,” Ex. 1006) in view of H4-51115 to Motoharu et al. (“Motoharu,” Ex.1025) renders obvious the limitations of the substitute claims.

**a. Detailed Analysis**

5. The following claim chart describes how the Park reference in view of the Motoharu reference renders obvious the Substitute Claims 21, 22, and 23.

<b>Claim 21</b>	<b>Prior Art</b>
[21.0] A wireless power receiver, comprising:	Park discloses: “a wireless power receiver.”

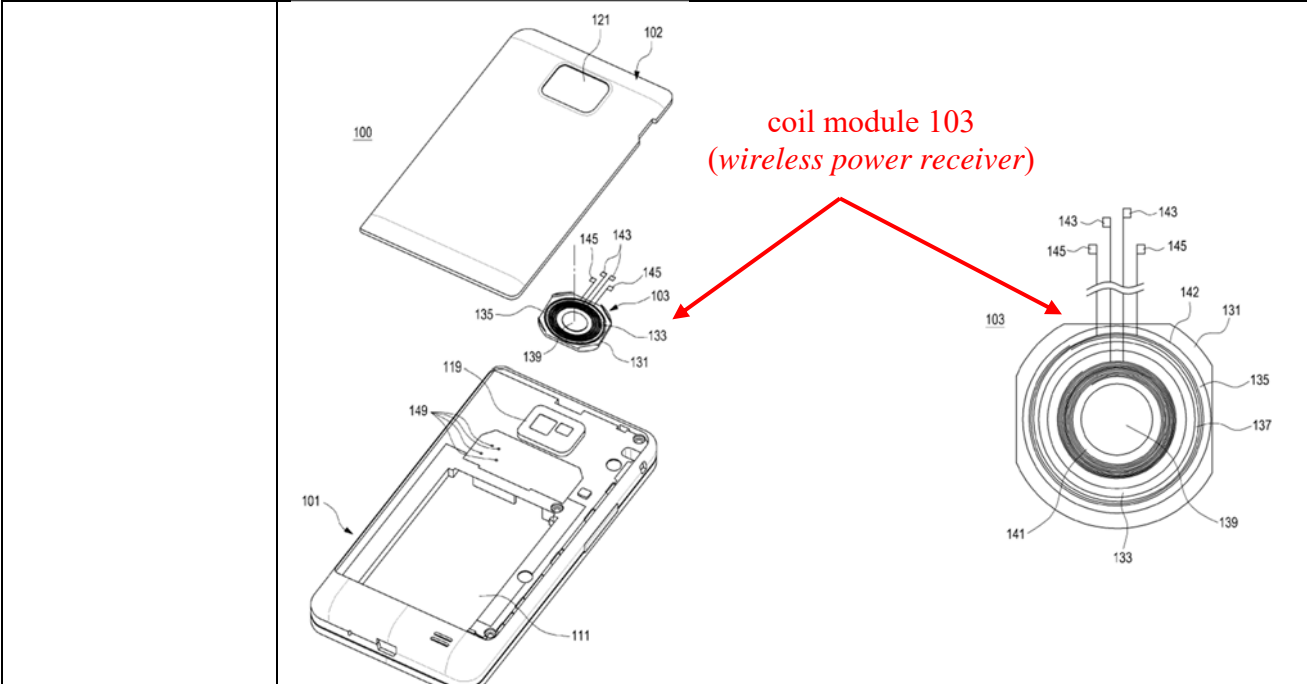


FIG. 1

**Ex.1006, Figs. 1 and 2 (annotated)**

Specifically, as shown above in Figs. 1 and 2, Park discloses a “coil module 103” (*wireless power receiver*), where “a portable terminal [] implements both a wireless charging function and an NFC function using the coil module 103.” Ex.1006, 3:4-11, 4:60-65.

[21.1] a substrate comprising a receiving space of a predetermined shape formed therein for a discrete connecting unit configured to connect to a wireless power receiving

Park in view of Motoharu renders obvious: “a substrate comprising a receiving space of a predetermined shape formed therein for a discrete connecting unit configured to connect to a wireless power receiving circuit.”

Figures 2 and 3 of Park are annotated below.

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