UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.,
Patent Owner

IPR2022-00350 Patent 9,806,565

PATENT OWNER'S RESPONSE

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III.	OVERVIEW OF ASSERTED REFERENCES
	A. Hong (Ex. 1005)—the primary reference applied in Ground 1—does not disclose the claimed invention
IV.	CLAIM CONSTRUCTION
	A. Claims 1 and 12 require separate components for the "substrate comprising a receiving space" and the "connecting unit"
	1. It is well-settled law that separate claim elements are presumed to be distinct components of the claimed invention
	2. The challenged claims support the presumption that the "substrate comprising a receiving space," the "coil unit" and the "connecting unit" are separate and distinct components
	3. The specification supports the presumption that the "substrate comprising a receiving space," the "coil unit" and the "connecting unit" are separate and distinct components
	4. The prosecution history supports the presumption that the "substrate comprising a receiving space," the "coil unit" and the "connecting unit" are separate and distinct components
V.	THE PETITION FAILS BECAUSE HONG DOES NOT TEACH A "SUBSTRATE COMPRISING A RECEIVING SPACE" AND A "CONNECTING UNIT" AS SEPARATE AND DISTINCT COMPONENTS



IPR2022-00350 ('565 Patent) Patent Owner's Response

	A.	The Petition asserts that Hong alone discloses these claim limitations the Petition does not assert any combination of references or articular any modifications to Hong	te
	B.	Hong does not disclose a "substrate comprising a receiving space" the is separate and distinct from the "connecting unit"	
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