

**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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IPR2022-00351  
U.S. Patent No. 10,622,842

**PETITIONER'S REPLY  
TO PATENT OWNER'S RESPONSE**

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    A. Suzuki’s “Sixth” embodiment supports the obviousness combination of Ground 1 because it builds upon features described in previous embodiments. .... 4

    B. Claim 7 is broad enough to encompass any interpretation of Suzuki. .... 9

III. PARK IS PRIOR ART BECAUSE THE ’842 PATENT IS NOT ENTITLED TO ITS EARLIEST CLAIMED PRIORITY DATE (GROUND 2).....11

    A. Patent Owner did not meet its burden of production to show that Park is not prior art, nor could they have. .... 14

    B. There is no evidence that the Examiner was aware of the new subject matter. .... 16

IV. THE PETITION ESTABLISHES THAT SUZUKI AND PARK RENDER OBVIOUS PLACING A WIRELESS CHARGING COIL AND COMMUNICATION ANTENNA ON THE SAME LAYER .....20

    A. Park’s groove technique provides shielding between the antenna and the wireless charging coil. .... 21

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CERTIFICATE OF WORD COUNT.....30

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**PETITIONER'S EXHIBIT LIST**

Ex.1001	U.S. Patent No. 10,622,842
Ex.1002	Prosecution History of U.S. Patent No. 10,622,842
Ex.1003	Declaration of Dr. Joshua Phinney under 37 C.F.R. § 1.68
Ex.1004	<i>Curriculum Vitae</i> of Dr. Joshua Phinney
Ex.1005	U.S. 8,421,574 to Suzuki et al. ("Suzuki")
Ex.1006	U.S. Patent No. 8,922,162 to Park et al. ("Park")
Ex.1007	Prosecution History of U.S. Patent No. 10,153,666
Ex.1008	U.S. Patent No. 10,069,346
Ex.1009	U.S. Patent Publication No. 2010/0203831 to Muth ("Muth")
Ex.1010	U.S. Patent No. 8,687,536 to Michaelis ("Michaelis")
Ex.1011	Redline comparison between U.S. Patent No. 10,069,346 specification in the issued patent (text taken from USPTO website) with the as-filed specification of U.S. Patent No. 10,153,666 (text taken from publication 2017/0338697 on the USPTO website, which represents the as-filed specification of the '666 patent).
Ex.1012	Reserved.
Ex.1013	Reserved.
Ex.1014	Reserved.
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. Apple Inc.</i> , WDTX-6-21-cv-00579 (served Sept. 7, 2021)
Ex.1017	Reserved

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Petitioner's Reply to Patent Owner's Response

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Ex.1018	Reserved
Ex.1019	Reserved
Ex.1020	Order Cancelling Markman Hearing, <i>Scramoge Tech. Ltd. v. Apple Inc.</i> , WDTX-6-21-cv-00579 (filed Sept. 28, 2021)
Ex.1021	Docket Sheet, <i>Scramoge Tech. Ltd. v. Apple Inc.</i> , WDTX-6-21-cv-00579
Ex.1022	Order Setting Initial Case Management Conference and ADR Deadlines, <i>Scramoge Tech. Ltd. v. Apple Inc.</i> , NDCA-22-cv-03041 (filed May 24, 2022)
<b>Ex.1023</b>	<b>Ricketts Deposition Transcript</b>

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