UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD FANTASIA TRADING LLC d/b/a ANKERDIRECT. ("ANKER"), Petitioner v. SCRAMOGE TECHNOLOGY LTD. ("SCRAMOGE"), Patent Owner Case IPR2022-00499 Patent No. 7,825,537

DECLARATION OF TAMAS SZEPESI, Ph.D.



TABLE OF CONTENTS

I.	Intro	oduction	9
II.	Back	ground and Qualifications	10
III.	Leve	l of Ordinary Skill in the Art	14
IV.	Mate	erials Considered and Relied Upon	15
V.	Legal Standards		
	A.	Legal Standards for Prior Art	17
	B.	Legal Standard for Priority Date	18
	C.	Legal Standard for Anticipation	19
	D.	Legal Standard for Obviousness	19
VI.	Tech	nology Overview	21
	A.	Switching voltage regulators	21
	B.	Switching voltage regulator control	24
	C.	Buck converter with voltage mode control	26
	D.	Wireless power transfer systems	32
VII.	Over	view of the '537 Patent	43
	A.	Subject Matter Overview	43
	B.	File History of the '537 patent	51
	C.	Interpretation of the '537 Patent Claims at Issue	52
VIII	.Over	view of the Cited References	53
	A.	Baarman (EX1004)	53
	В.	Partovi-002 (EX1005)	63
	C.	Partovi-413 (EX1006)	64
	D.	Flowerdew (EX1007)	65



	E.	Jang (EX1010)	67
IX.		nd 1(A): BAARMAN IN VIEW OF PARTOVI-002 DERS CLAIMS 1-5, 8-16, 19-22, AND 28 OBVIOUS	69
	A.	Independent claim 1	
		[1.P] A method for inductively transferring power from a base unit providing input power, to a target unit providing output power, where the base unit and the target unit are electrically isolated, comprising:	70
		[1.1] positioning a second inductive element of said target unit within a predetermined distance of a first inductive element of said base unit;	71
		[1.2] applying a time varying electric current to said first inductive element to produce a time varying magnetic field, said time varying magnetic field induces an electric current in said second inductive element;	75
		[1.3] monitoring at least one parameter indicative of an efficiency of power transfer from said base unit to said target unit;	75
		[1.4] automatically adjusting at least one characteristic of said time varying electric current responsive to said parameter to maximize an efficiency of power transfer from said base unit to said target unit.	80
	B.	Claim 2	80
	C.	Claim 3	81
	D.	Claim 4	81
	Ε.	Claim 5	83
	F.	Claim 8	87
	G.	Claim 9	89
	Н.	Claim 10	91
	ī	Claim 11	02



J.	Independent claim 12	92
	[12.P] An inductive power transfer system, comprising:	93
	[12.2] a positioning structure provided on at least one of said base unit and said target unit for removably positioning said second inductive element at a predetermined orientation and distance relative to said first inductive element;	94
	[12.3] a switch element configured for selectively applying a time varying electric current to said first inductive element to produce a time varying magnetic field, said time varying magnetic field inducing an electric current in said second inductive element; and	96
	[12.4] a control circuit configured for monitoring at least one parameter indicative of an efficiency of power transfer from said base unit to said target unit, and	97
	[12.5] automatically adjusting at least one characteristic of said time varying electric current responsive to said parameter to maximize an efficiency of power transfer from said base unit to said target unit.	98
K.	Claim 13	98
L.	Claim 14	98
M.	Claim 15	99
N.	Claim 16	.100
O.	Claim 19	.103
P.	Claim 20	.103
Q.	Claim 21	.104



R.	Claim 22	104
S.	Independent claim 28	104
	[28.P] A method for inductively transferring power from a base unit providing input power, to a target unit providing output power, where the base unit and the target unit are electrically isolated from each other, comprising:	105
	[28.1] positioning a second inductive element of said target unit within a predetermined distance of a first inductive element of said base unit;	105
	[28.2] applying a time varying electric current to said first inductive element to produce a time varying magnetic field having an operating frequency, said time varying magnetic field inducing an electric current in said second inductive element;	106
	[28.3] monitoring at least one parameter of an electronic component of said base unit that is indicative of an efficiency of power transfer from said base unit to said target unit; and	106
	[28.4] automatically adjusting said operating frequency based on a value of said parameter to maximize said efficiency of power transfer from said base unit to said target unit	108
		108
A.	Overview of Combination	
B.	Claim 6	110
C.	Claim 7	112
D.	Claim 17	113
Ε.	Claim 18	113
		111
A.	Independent claim 1	
	Group PAR A. B. C. D. E. Group 10-11	S. Independent claim 28 [28.P] A method for inductively transferring power from a base unit providing input power, to a target unit providing output power, where the base unit and the target unit are electrically isolated from each other, comprising:



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

