

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

SCRAMOGE TECHNOLOGY LTD.
Patent Owner.

U.S. Patent No. 7,825,537

DECLARATION OF DR. GARY WOODS

TABLE OF CONTENTS

| | Page |
|--|------|
| I. INTRODUCTION | 1 |
| II. MY BACKGROUND AND QUALIFICATIONS | 2 |
| III. LIST OF DOCUMENTS CONSIDERED IN FORMULATING MY OPINIONS..... | 5 |
| IV. RELEVANT LEGAL STANDARDS | 5 |
| A. Prior Art and Anticipation..... | 6 |
| B. Obviousness..... | 8 |
| C. Claim Construction..... | 10 |
| V. PERSON OF ORDINARY SKILL IN THE ART | 15 |
| VI. OVERVIEW OF THE '537 PATENT | 16 |
| VII. PROSECUTION HISTORY OF THE '537 PATENT..... | 19 |
| VIII. PRIORITY DATE OF THE '537 PATENT | 20 |
| IX. CLAIM CONSTRUCTION | 20 |
| X. GROUNDS FOR FINDING THE CHALLENGED CLAIMS INVALID..... | 21 |
| A. Overview of Inductive Power Transfer Systems | 21 |
| B. Overview of Prior Art References..... | 23 |
| 1. Overview of Cook (Ex-1005) | 23 |
| 2. Overview of Baarman (Ex-1008)..... | 27 |
| 3. Overview of Partovi (Ex-1009) | 31 |
| C. Detailed Explanation of the Unpatentability Grounds..... | 32 |
| D. Ground 1: Claims 1-5, 9-16, 20-22, and 28 Are Anticipated By Cook (Ex-1005)..... | 33 |
| 1. Claim 1 | 33 |
| 2. Claim 2 | 49 |
| 3. Claim 3 | 49 |
| 4. Claim 4..... | 51 |

TABLE OF CONTENTS
(continued)

| | Page |
|---|-------------|
| 5. Claim 5 | 53 |
| 6. Claim 9 | 54 |
| 7. Claim 10 | 56 |
| 8. Claim 11 | 58 |
| 9. Claim 12 | 59 |
| 10. Claim 13 | 64 |
| 11. Claim 14 | 64 |
| 12. Claim 15 | 65 |
| 13. Claim 16 | 66 |
| 14. Claim 20 | 67 |
| 15. Claim 21 | 67 |
| 16. Claim 22 | 68 |
| 17. Claim 28 | 68 |
| E. Ground 2: Claims 5 and 16 Are Rendered Obvious By Cook (Ex-1005) in view of Baarman (Ex-1008) | 71 |
| 1. Dependent Claims 5 and 16 | 71 |
| F. Ground 3: Claims 1-5, 9, 10, and 28 Are Anticipated By Baarman (Ex-1008) | 75 |
| 1. Claim 1 | 75 |
| 2. Claim 2 | 91 |
| 3. Claim 3 | 91 |
| 4. Claim 4 | 93 |
| 5. Claim 5 | 94 |
| 6. Claim 9 | 95 |
| 7. Claim 10 | 97 |
| 8. Claim 28 | 98 |

TABLE OF CONTENTS
(continued)

| | Page |
|---|-------------|
| G. Ground 4: Claims 1-5, 9-16, 20-22, and 28 Are Rendered Obvious By Baarman (Ex-1008) in view of Partovi (Ex-1009) | 100 |
| 1. Claim 12 | 100 |
| 2. Claim 13 | 110 |
| 3. Claim 14 | 110 |
| 4. Claim 15 | 111 |
| 5. Claim 16 | 112 |
| 6. Claim 20 | 112 |
| 7. Claim 21 | 113 |
| 8. Claim 22 | 113 |
| 9. Claims 1-5, 9-10, and 28 | 115 |
| 10. Claim 11 | 116 |
| XI. CONCLUSION | 116 |

I, Gary Woods, hereby declare as follows.

I. INTRODUCTION

1. I have been retained as an expert witness on behalf of Google LLC, Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Petitioner”) for the above-captioned *inter partes* review (IPR). I understand that Petitioner challenges the validity of Claims 1-5, 9-16, 20-22, and 28 of U.S. Patent No. 7,825,537.

2. I am over the age of eighteen (18) and otherwise competent to make this declaration. I am being compensated for my time in connection with this IPR at my standard consulting rate.

3. I understand that the petition for *inter partes* review involves U.S. Patent No. 7,825,537 (“the ’537 Patent”), Ex-1001, which resulted from U.S. Application No. 12/271,023 (the “’023 Application”). The ’023 Application was filed on November 14, 2008 and names Benjamin Freer as the inventor. *See* Ex-1001 at Cover. The ’537 Patent issued on November 2, 2010. I further understand that, according to USPTO records, the ’537 Patent is currently assigned to Scramoge Technology Limited (“Patent Owner” or “Scramoge”).

4. I have been asked to assume that the earliest date to which the ’537 Patent is entitled to priority is November 14, 2008.

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.