

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,	§	Civil Action No. 6:21-cv-00902-ADA
Plaintiff,	§	Complaint Filed: August 30, 2021
v.	§	<b>JURY TRIAL DEMANDED</b>
SAMSUNG ELECTRONICS CO., LTD., and SAMSUNG ELECTRONICS AMERICA, INC.,	§	
Defendants.	§	
SCRAMOGE TECHNOLOGY LTD.,	§	Civil Action No. 6:21-cv-01071-ADA
Plaintiff,	§	Complaint Filed: June 7, 2021
v.	§	<b>JURY TRIAL DEMANDED</b>
APPLE INC.,	§	
Defendant.	§	
SCRAMOGE TECHNOLOGY LTD.,	§	Civil Action No. 6:21-cv-01138-ADA
Plaintiff,	§	Complaint Filed: November 4, 2021
v.	§	<b>JURY TRIAL DEMANDED</b>
GOOGLE LLC,	§	
Defendant.	§	

**DEFENDANTS' JOINT OPENING CLAIM CONSTRUCTION BRIEF**

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## INTRODUCTION

Defendants Apple Inc. (“Apple”); Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”); and Google LLC (“Google”) submit this opening claim construction brief, pursuant to the Court’s Scheduling Order (Dkt. 36), to construe terms of U.S. Patent Nos. 7,825,537 (“the ’537 Patent”); and 10,193,392 (“the ’392 Patent”) ( “the Asserted Patents”)<sup>1</sup>.

## OVERVIEW OF THE ASSERTED PATENTS

### **1. The ’537 Patent**

The ’537 Patent relates to the production of power to be transferred wirelessly. Specifically, the ’537 Patent is directed to an inductive power transfer system that is designed to address, among other things, “power transfer efficiency concerns.” ’537 Patent, at 1:34. The ’537 Patent purports to address these concerns through a “converter sub-circuit 110 [that] includes an [sic] first inductive element 112 and a switching network 114 for directing current to or from the first inductive element 112 at an operating frequency.” ’537 Patent, at 3:41-43. According to the ’537 Patent, “power can be transferred to the target unit 103 via a secondary coil formed from a second inductive element 120 in the target unit 103.” ’537 Patent, at 3:62-64; Fig. 1.

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<sup>1</sup> U.S. Patent No. 9,490,652 is also asserted against Apple and Samsung, and U.S. Patent No. 10,199,876 is asserted against Samsung. The parties do not contend that any terms of these patents require construction.

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